

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-CR-496 (TJK)</b>
	:	
<b>MARK S. IBRAHIM,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT STATUS REPORT AND UNOPPOSED MOTION FOR CONTINUANCE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, by and through his attorney, Marina Medvin, (collectively, “the parties”), respectfully submit this joint status report and the defendant’s unopposed request for a continuance, and state as follows:

1. On March 16, 2023, the defendant filed a notice of an interlocutory appeal, ECF No. 78, regarding the Court’s March 3, 2023 oral ruling, which denied the defendant’s motions to dismiss at ECF Nos. 48 and 61.

2. On May 5, 2023, the parties appeared before the Court for a status conference. In light of the Court of Appeals’ jurisdiction over the defendant’s interlocutory appeal, the Court set a further status conference on August 1, 2023, but directed the parties to advise the Court in advance as to any relevant developments in the defendant’s interlocutory appeal. The time until the August 1, 2023 status conference was excluded under the Speedy Trial Act.

3. On June 2, 2023, the Court of Appeals issued a per curiam order dismissing the defendant’s interlocutory appeal. Document #2001922, USCA Case #23-3037. The order directed the Clerk to withhold issuance of the mandate therein until seven days after resolution of any timely petition for rehearing or petition for rehearing en banc.

4. On June 30, 2023, the defendant filed with the Court of Appeals a petition for rehearing en banc. That petition is currently pending.

5. In light of the pending petition, the defendant requests a continuance for a further 90 days. The government does not oppose this request. Should the Court grant a continuance, the parties agree that, in light of the defendant's ongoing interlocutory appeal, the time until the next hearing should be excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(1)(C). The parties also agree that, in advance of any future hearing, they will advise the Court of any relevant developments in the defendant's interlocutory appeal through an additional joint status report.

For the Defendant:



Marina Medvin, Esq.  
*Counsel for the Defendant*  
MEDVIN LAW PLC  
916 Prince Street  
Alexandria, Virginia 22314  
Tel: 888.886.4127  
Email: [contact@medvinlaw.com](mailto:contact@medvinlaw.com)

Respectfully submitted,

For the United States:

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar Number 481052

/s/ Nathaniel K. Whitesel  
NATHANIEL K. WHITESEL  
Assistant United States Attorney  
DC Bar No. 1601102  
601 D Street NW  
Washington, DC 20530  
[nathaniel.whitesel@usdoj.gov](mailto:nathaniel.whitesel@usdoj.gov)  
(202) 252-7759

/s/ James D. Peterson  
JAMES D. PETERSON  
Trial Attorney  
United States Department of Justice  
Special Assistant U.S. Attorney – D.C.  
VA Bar 35373  
1331 F Street N.W.  
6th Floor  
Washington, D.C. 20530  
(202) 353-0796  
[James.d.peterson@usdoj.gov](mailto:James.d.peterson@usdoj.gov)