

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	
	:	<b>Case Number 21-CR-615</b>
<b>STEVEN THURLOW,</b>	:	
	:	
<b>Defendant.</b>	:	<b>Hon. Paul L. Friedman</b>

**JOINT MOTION FOR EXCLUDABLE DELAY**

The Government and Defendant request that the plea hearing date of February 24, 2022 in this case be adjourned to April 11, 2022. There is a large amount of global discovery that has and continues to be produced in this case on an ongoing basis. Defense needs time to look at and to evaluate all of this evidence. In addition to all of these things, there is an ongoing global pandemic that has slowed the process of doing in-person meetings.

Furthermore, in the process of negotiating a plea in this case, the defense has provided information and documents for the Government to consider. The Government has reviewed that evidence and made an amended plea offer to the defense on February 22, 2022. Therefore, the defense needs time to consider the plea.

The Government further moves for a finding of excludable delay between the dates of February 24, 2022 and April 11, 2022. The parties agree that this case is “unusual and complex” due to the nature of the prosecution. *See* 18 U.S.C. § 3161(h)(7)(B)(ii), *see also* § 3161(h)(7)(B)(iv), and that, therefore, this time should be excluded in calculating the time within which the defendant must be brought to trial under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1).

Additionally, the parties have started plea discussions and would like time to continue the discussions.

Pursuant to 18 U.S.C. § 3161(h)(7)(A), the time period shall constitute excludable delay and that the ends of justice served outweigh the best interests of the defendant and the public in a speedy trial. The excludable delay requested is reasonable and necessary so that defendant can fully prepare for trial and review the voluminous evidence in this case.

Respectfully submitted,

MATTHEW GRAVES  
UNITED STATES ATTORNEY

By: /s/ Mitra Jafary-Hariri  
MITRA JAFARY-HARIRI  
Assistant United States Attorney, Detailee  
MI Bar No. P74460  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
mitra.jafary-hariri@usdoj.gov, (313) 226-9632

/s/ Jonathan Epstein (with consent)  
JONATHAN EPSTEIN  
Attorney for Defendant  
613 Abbott 5th Floor  
jonathan\_epstein@fd.org  
(313) 967-5840

Date: February 24, 2022

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<b>Defendant.</b>	:	<b>Hon. Paul L. Friedman</b>

**ORDER FOR EXCLUDABLE DELAY**

This matter having come before the Court upon the Government’s motion for excludable delay, the status hearing date of February 24, 2022 in this case is adjourned to April 11, 2022 at 3 p.m. In granting the parties’ request for an adjournment, the Court finds that the ends of justice served outweigh the best interests of the defendant and the public in a speedy trial for the reasons listed in the Government’s motion and because this case is “unusual and complex” due to the nature of the prosecution. *See* 18 U.S.C. § 3161(h)(7)(B)(ii), *see also* § 3161(h)(7)(B)(iv). There are thousands of pages in discovery and large amounts of forensic data. Additionally, the pandemic has slowed the parties’ ability to meet in-person.

Thus, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 18 U.S.C. §§ 3161(h)(7)(B)(ii) and (B)(iv), the time period between February 24, 2022 and April 11, 2022 shall constitute excludable delay.

IT IS SO ORDERED.

Dated:

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HONORABLE PAUL L. FRIEDMAN  
United States District Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of this pleading was served on all counsel of record via the Court's electronic filing service.

/s/ Mitra Jafary-Hariri  
Mitra Jafary-Hariri  
Assistant United States Attorney

Date: February 24, 2022