

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

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

JOINT MOTION FOR EXCLUDABLE DELAY

The Government and Defendant request that the plea hearing date of April 11, 2022 in this case be adjourned to June 30, 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. Since February 22, 2022, the parties met in person to discuss the terms of the plea and the evidence in the case. Based on the discussions, the parties need to review additional information before being able to agree to terms.

Additionally, on April 12, 2022, new counsel for defendant was appointed to the case. Counsel of record, therefore, needs time to review the evidence that has previously been produced, confer with Defendant, and review the plea offer that the government has tendered.

The parties further move for a finding of excludable delay between the dates of April 11, 2022 and June 30, 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 and review discovery further.

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/ James Gerometta (with consent)
JAMES GEROMETTA
Attorney for Defendant
613 Abbott 5th Floor
james_gerometta@fd.org

Date: April 13, 2022