

UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : **CRIMINAL NO. 21-mj-494**  
 :  
 STEVEN THURLOW, :  
 Defendant. :

**CONSENT MOTION TO CONTINUE PRELIMINARY HEARING AND FOR  
EXCLUDABLE DELAY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files this Consent Motion to Continue the Preliminary Hearing in the above-captioned matter from September 7, 2021 to October 7, 2021. The Government and the defendant agree that there is good cause to extend the complaint in this case from September 7, 2021 to October 7, 2021, and to adjourn the preliminary hearing/status conference in this case to October 7, 2021. Defendant concurs in this request and agrees that it is in his best interest. In support thereof, the government states as follows:

1. The government and counsel for the defendant have conferred and are continuing to communicate to resolve this matter. Counsel for Defendant was appointed when he appeared in DC via Zoom. Defendant retained new counsel in Michigan, causing his current counsel to close his file. Since then, the retained counsel has not been able to secure admission to this Court, nor has he been able to obtain local counsel. Therefore, the current counsel for defendant will remain on the case and needs more time to reopen his file and confer with his client. The parties agree that the complaint will remain in full force and effect through the new date of October 7, 2021. The parties agree that this stipulation and any order resulting therefrom shall not affect any

previous order of pretrial detention or pretrial release.

2 The parties, therefore, would respectfully request that the preliminary hearing and the date by which an information or an indictment must be filed be continued until October 7, 2021. The parties agree that the failure to grant this continuance “would deny counsel for the defendant . . . the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore, “the ends of justice served by the granting of such continuance [will] outweigh the best interests of the public and the defendant in a speedy trial,” 18 U.S.C. § 3161(h)(7)(A), and the parties request an order to that end. The parties agree that pursuant to 18 U.S.C. § 3161, the time from September 7, 2021 to October 7, 2021 shall be excluded in computing the date for speedy trial in this case.

Wherefore, the parties respectfully request that the Court continue the Preliminary Hearing in this matter until October 7, 2021.

Respectfully submitted,

CHANNING PHILLIPS  
ACTING UNITED STATES ATTORNEY

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