

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-cr-00077(BAH)
	:	
IRAJ JAVID,	:	
	:	
Defendant.	:	

JOINT RESPONSE

Pursuant to the Court’s July 26, 2022 minute order, the United States of America and Defendant Iraj Javid, through counsel, hereby notify the Court that the government has extended a plea offer to Defendant, but that offer will not have expired by August 5, 2022. The government extended a formal plea offer to Mr. Javid on July 27, which expires on August 18. Mr. Javid and his counsel require time to review and discuss the proposed plea agreement. The parties suggest resetting the matter for status call on August 19. The defense agrees to toll Speedy Trial time between today’s date and the new status hearing date as excludable time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv). If a plea agreement is finalized prior to August 18, the parties will contact the Court to request a date for entry of the plea. If an agreement is not finalized, the parties will submit proposed trial dates to the Court by August 15, 2022.

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Respectfully submitted,

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/s/
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