

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case Number 22-cr-16
BRYAN BUSTOS, et al.,	:	
	:	
Defendant.	:	Hon. Carl J. Nichols

CONSENT MOTION FOR EXCLUDABLE DELAY

The parties request that the time between March 24, 2022 in this case be excluded until June 1, 2022 and that any Court dates be adjourned during that period. The amount of discovery is voluminous in this case, constituting thousands of pages, and that there are terabytes of forensic data to sift through. There are multiple electronic device dumps and vast data to review. There is also 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.

The Government has recently produced large volumes of evidence to the defense in this case and the defense need time to review it and confer with their clients. The parties, therefore, move for a finding of excludable delay between the dates of March 24, 2022 and June 1, 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/ Allen Howard Orenberg (with consent)
ALLEN HOWARD ORENBERG
Counsel for Bryan Bustos
THE ORENBERG LAW FIRM, P.C.
12505 Park Potomac Avenue 6th Floor
Potomac, MD 20854
aorenberg@orenberglaw.com
301-984-8005

/s/ Joseph Roll Conte (with consent)
JOSEPH ROLL CONTE
Counsel for Alexis Bustos
LAW OFFICES OF J.R. CONTE, P.L.L.C
400 Seventh Street, N.W. Suite 206
Washington, DC 20004
dccunlaw@gmail.com
202-638-4100

Date: March 23, 2022