

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

UNITED STATES OF AMERICA

v.

**IMRAN AWAN, and
HINA ALVI**

Defendants.

Case No. 17-cr-00161 (TSC)

**CONSENT MOTION TO CONTINUE STATUS CONFERENCE
AND EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby submits this consent motion to continue the status conference scheduled for November 30, 2017, at 9:30 a.m., to January 8, 2017, and to toll the Speedy Trial Act time in the interim. In support of this motion, the government submits the following:

1. The defendants are charged by indictment with: (1) conspiracy to commit bank fraud, false statements on a loan or credit application, and unlawful monetary transactions, in violation of 18 U.S.C. § 371; (2) bank fraud, in violation of 18 U.S.C. § 1344(2); (3) false statements on a loan or credit application, in violation of 18 U.S.C. § 1040; and (4) and unlawful monetary transactions, in violation of 18 U.S.C. § 1957.

2. The Court scheduled the next status conference for November 30, 2017, at 9:30 a.m. Since the last status conference, the government has been in discussions with counsel for the defendants regarding complex discovery issues and other legal issues in this case, in particular issues surrounding claims of attorney-client privilege being raised by defendant Imran Awan. In addition, the government has provided the defendants with additional discovery regarding various issues. Last night, counsel for both defendants indicated that they need additional time to review and analyze these issues, along with the voluminous discovery the government provided in this

case. The government consents to this request.

3. The government understands the Court is available for a continued status conference on January 8, 2018, between 11:00 a.m. and 12:00 p.m., and after 3:00 p.m. The parties respectfully request that the status conference currently scheduled for November 30, 2017, be continued to one of those times (unfortunately, the parties are unavailable before 11:00 a.m. on January 8, 2018).

4. Counsel for both defendants have also informed the government that their clients have agreed to toll the Speedy Trial clock during this continuance. 18 U.S.C. § 3161(h)(7)(A) allows the Court to exclude a period of time from the Speedy Trial Act calculation if the Court finds “that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” In this case, the ends of justice are served by affording both defendants additional time to review the voluminous discovery provided by the government and to assess other legal issues, in order to more properly advise their clients in advance of the next status conference.

WHEREFORE, for the foregoing reasons, and for any other such reasons as may appear to the Court, the government respectfully requests that the Court enter the proposed order continuing the status hearing to one of the dates suggested above and excluding from computation under the Speedy Trial Act the period of time covered by that continuance.

Respectfully submitted,

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