## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

#### UNITED STATES OF AMERICA,

Plaintiff,

Cr. No. 16-cr-20098

v.

Hon. George Caram Steeh

KHALIL ABU-RAYYAN

Defendant.

# **Stipulation Seeking Adjournment**

Through their respective counsel, the parties stipulate and agree to a 30-day extension of the currently scheduled motion, plea and trial deadlines. The parties agree and stipulate that the additional time is necessary for the parties to receive and review discovery, conduct investigation, file motions, and engage in plea negotiations. Pursuant to 18 U.S.C. §§ 3161(h)(7), the parties stipulate that the extended time period shall constitute excludable delay and that the ends of justice served by this delay outweigh the interests of the defendants and the public in a speedy trial. Defendants also waive their right to a speedy trial under the Interstate Agreement on Detainers and agrees that the court enter an order consistent with this stipulation.

IT IS SO STIPULATED.

Respectfully submitted,

<u>s/Ronald Waterstreet</u> Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, Michigan 48226 Phone: (313) 226-9597 e-mail: <u>Ronald.Waterstreet@usdoj.gov</u> <u>s/Todd Shanker</u> Counsel for Khalil Abu-Rayyan 613 Abbott, 5th floor Detroit, MI 48226 (313) 967-5879 email: Todd\_Shanker@fd.org

Dated: March 7, 2016

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#### UNITED STATES OF AMERICA,

Plaintiff, Cr. No. 16-cr-20098

v.

Hon. George Caram Steeh

KHALIL ABU-RAYYAN

Defendant.

### **ORDER OF ADJOURNMENT AND FINDING OF EXCLUDABLE DELAY**

This matter having come before the Court upon the stipulation of the parties, the Court finds that the period of adjournment shall be excluded in calculating the time within which the defendant has a right to a speedy and public trial pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h). The Court further finds that such a delay is necessary to permit the parties to review discovery, conduct investigation, and engage in plea negotiations pursuant to 18 U.S.C. §§ 3161(h)(7).

IT IS ORDERED that pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, and in consideration of the factors listed in section 3161(h)(7), the ends of justice are best served by granting an adjournment in this case, and these ends outweigh the interest of the public and the defendant in a speedy and public trial and that any delay occasioned by this adjournment shall be deemed excludable under the Speedy Trial Act.

The period of April 19th<sup>th</sup> to May 17, 2016 shall constitute excludable delay under the Speedy Trial Act. The new deadline dates are as follows.

Motions due: March 28, 2016

Plea Cut-Off Hearing: May 5, 2016 at 10:30 a.m.

Trial: May 17, 2016 at 9:00 a.m.

IT IS SO ORDERED.

<u>s/George Caram Steeh</u> George Caram Steeh United States District Judge

Date: March 7, 2016