

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 18-MJ-230 (FLN)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 MICHAEL MCWHORTER,)
 JOSEPH MORRIS,)
 MICHAEL HARI,)
)
 Defendant.)

**JOINT MOTION FOR EXTENSION
OF TIME FOR FILING
INDICTMENT OR INFORMATION**

Pursuant to 18 U.S.C. § 3161(h), the United States of America, by and through its attorneys Gregory G. Brooker, United States Attorney for the District of Minnesota, and Assistant United States Attorneys Julie E. Allyn and John F. Docherty along with Defendants Michael McWhorter, Joseph Morris, and Michael Hari, each by and through their attorneys, Christopher W. Madel, Robert D. Richman, and Shannon R. Elkins, jointly move the Court for a sixty-day extension of time within which to file an Indictment or Information in the above-captioned matter. The grounds for this Motion are as follows:

1. On March 13, 2018, the United States Attorney’s Office issued a criminal complaint (ECF No. 1) naming each of the above-named defendants and alleging violations of 18 U.S.C. §844(i).

2. On March 26, 2018, all three of the above-named defendants were arrested and made their initial appearances on the Minnesota complaint in the Central District of Illinois pursuant to Fed. R. Crim. Pro. 5(a)(1) and 5(c)(3). Pursuant to 18 U.S.C. § 3161(b), an indictment must be returned or an information filed no later than April 25, 2018.

3. Each of the above-named defendants has been appointed counsel and is detained in the Central District of Illinois on the Illinois complaint, 18-MJ-7062-EIL. Pursuant to Court Order, each of the defendants will remain in Illinois pending disposition of their case in the Central District of Illinois.

4. On March 28, 2018, Robert D. Richman was appointed to represent Joseph Morris. On March 29, 2018, Christopher Madel was appointed to represent Michael McWhorter. On March 30, 2018, Shannon R. Elkins was appointed to represent Michael Hari.

5. Due to the complexity of the cases pending in each district, the distance between counsel and their clients, and the understanding that the defendants will not be brought to Minnesota until the Central District of Illinois cases are resolved, the parties seek an additional 60-day extension to bring the matter before the grand jury or file an Information in Minnesota pursuant to 18 U.S.C. §3161(b). This extension will serve the interests of the Defendants, the public, and justice. In addition, an extension will promote judicial economy.

6. Counsel for each Defendant has consulted with each Defendant about this extension request, and the Defendants consent to the request. Further, the Defendants agree that any period of delay is excluded from the calculation of time under the Speedy Trial Act, 18 U.S.C. §3161.

For the foregoing reasons, the parties jointly request that the Motion for an additional 60 days of time for filing an indictment or information in the above-captioned matter be granted. A proposed order accompanies this motion via e-mail to the Court.

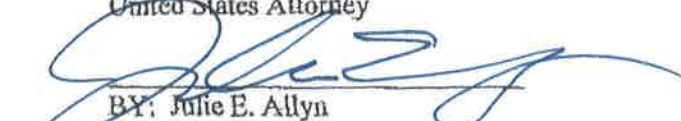
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GREGORY G. BROOKER
United States Attorney

Dated:

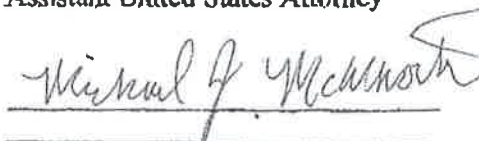

BY: Julie E. Allyn
Assistant United States Attorney

Dated:

 for
BY: John F. Docherty
Assistant United States Attorney


Dated:

4/11/18


MICHAEL MCWHORTER
Defendant

Dated:

4/13/2018

 by TLH
CHRISTOPHER W. MADEL
Counsel for Defendant

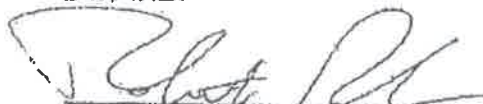
Dated:

4/9/18


JOSEPH MORRIS
Defendant

Dated:

4/10/2018


ROBERT D. RICHMAN
Counsel for Defendant

Dated:

4/10/2018


MICHAEL HARI
Defendant

Dated:

4/13/2018


SHANNON R. ELKINS
Counsel for Defendant