

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

UNITED STATES OF AMERICA,

v.

Case No. 2:19cr189

JAVAID PERWIZ,

Defendant.

**MOTION TO EXTEND DEADLINE  
FOR FILING MOTION**

Comes now the Defendant, Javaid Perwaiz (“Perwaiz”), by counsel, Lawrence H. Woodward, Jr., and Emily M. Munn, and moves the Court for an extension of the deadline to file pretrial motions. The reasons for this request are set forth below. Counsel has consulted with the prosecutors and there are no objection to this request.

The current deadline for filing motions is March 1, 2020, and the trial is scheduled to begin on June 3, 2020. Counsel has received two batches of discovery which consists of over 6000 medical records, voluminous hospital records, and a large amount of other documents that were seized during a search of the Defendant’s office. Counsel for Perwaiz met with the Assistant United States Attorney on February 20, 2020 to discuss the logistics and substance of the case. Defense counsel was advised that there is another voluminous production of discovery that will be available in the next 7-14 days and that the United States intends to return a superseding indictment during the week April 6-10, 2020. Neither the Defendant

nor the United States wants to or intends to request a continuance of the current trial date.

The defense requests that the motion cutoff be extended until April 20, 2020. This will give the defense approximately 10 days to file motions after having the final version of the charges and will also allow time to fully review and analyze the extremely large amount of discovery in this case. The United States has advised counsel that the Superseding Indictment will include additional charges and alleged victims. This extension will allow the defense to fully review all the discovery and charges prior to filing any motions if necessary. It will not impact the trial date.

WHEREFORE, the defense requests that the motions cutoff be extended until April 20, 2020.

Respectfully submitted,

JAVAID PERWAIZ

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of February, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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**PROPOSED ORDER**

THIS DAY CAME the Defendant, Javaid Perwaiz, by counsel, Lawrence H. Woodward, Jr., and Emily M. Munn, and moved the Court to extend the motions cutoff date until April 20, 2020.

IT APPEARING to the Court that good cause has been shown for this request, and no objection has been made by the United States, it is hereby **ORDERED** that the motions cutoff had been extended from March 1, 2020 to **April 20, 2020**.

ENTER:

This \_\_\_ day of February, 2020.

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Judge

WE ASK FOR THIS:

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SEEN AND AGREED:

/ s /

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