



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 14, 2015

Via ECF

The Honorable Paul A. Crotty
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: **United States v. Steven Jordan,**
15 Cr. 0012 (PAC)

Dear Judge Crotty:

The Government writes to request the exclusion of time pursuant to the Speedy Trial Act until the arraignment that is currently scheduled in this matter for February 10, 2015 at 2:15 p.m. Defense counsel Michael Bellinger, Esq., and Daniel Meachum, Esq., are unable to consult with their client at this time, and therefore are not in a position to consent to the Government's request.

On January 9, 2015, the grand jury returned an indictment charging the defendant with one count of failure to pay child support obligations to a child residing in another state, in violation of Title 18, United States Code, Section 228. Pursuant to an order issued by the Honorable James C. Francis IV at a bail hearing held on December 22, 2014, the defendant was at the time of indictment—and is currently—in a drug rehabilitation program in Georgia, his state of residence. Because the defendant will not complete the program until at least February 7, 2014, the Court has scheduled an arraignment in this matter for February 10, 2015.

Given the defendant's unavailability for court appearances and for meetings with defense counsel, the Government respectfully requests that time be excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from the date of this letter until the arraignment date of February 10, 2015.

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Thank you for your consideration of this request.

Very truly yours,

PREET BHARARA
United States Attorney

By: /S/
Andrew J. DeFilippis
Assistant United States Attorney
Southern District of New York
(212) 637-2231

Cc: Michael Bellinger, Esq.
Daniel Meachum, Esq.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

 ORIGINAL

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UNITED STATES OF AMERICA

v.

**Affirmation in Support of Application
for an Order of Continuance**

STEVEN JORDAN,

14 Mag. 1209

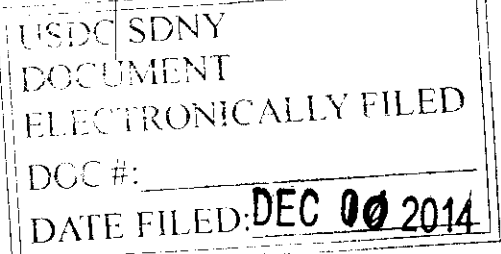
Defendant.

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State of New York)
County of New York : ss.:
Southern District of New York)

Andrew J. DeFilippis, pursuant to Title 28, United States Code, Section 1746, hereby
declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Preet Bharara, United States
Attorney for the Southern District of New York. I submit this affirmation in support of an
application for an order of continuance of the time within which an indictment or information
would otherwise have to be filed, pursuant to 18 U.S.C. §3161(h)(7)(A).

2. The defendant was charged in a complaint dated June 2, 2014, with violations of 18
U.S.C. § 228. The defendant was arrested in the Northern District of Georgia on June 10, 2014
and was subsequently released on bail. The defendant self-surrendered in the Southern District
of New York on June 23, 2014, and was presented before Magistrate Judge James C. Francis IV
on the same day. The defendant was represented by Michael Bellinger, Esq., and was released
on a personal recognizance bond. A preliminary hearing was scheduled for July 11, 2014.



3. On July 11, 2014, the Government, with the consent of the defendant, through counsel, requested a continuance of 30 days to engage in further discussions with counsel about the disposition of this case, and a continuance was granted on the same date, with time excluded through August 11, 2014;

4. On August 11, 2014, the Government, with the consent of the defendant, through counsel, requested a continuance of 30 days to engage in further discussions with counsel about the disposition of this case, and a continuance was granted on the same date, with time excluded through September 10, 2014;

5. On September 10, 2014, the Government, with the consent of the defendant, through counsel, requested a continuance of 30 days to engage in further discussions with counsel about the disposition of this case, and a continuance was granted on the same date, with time excluded through October 10, 2014;

6. On September 10, 2014, the Government, with the consent of the defendant, through counsel, requested a continuance of 30 days to engage in further discussions with counsel about the disposition of this case, and a continuance was granted on the same date, with time excluded through October 10, 2014;


7. On November 10, 2014, the Government, with the consent of the defendant, through counsel, requested a continuance of 30 days to engage in further discussions with counsel about the disposition of this case, and a continuance was granted on the same date, with time excluded through December 10, 2014;

8. Defense counsel and I have engaged in further discussions regarding a possible disposition of this case. The negotiations have not been completed, and we plan to continue our discussions but do not anticipate a resolution before the currently scheduled preliminary hearing date of December 10, 2014.

9. Therefore, the Government is requesting a continuance until January 9, 2014, to continue the foregoing discussions and reach a disposition of this matter. Defense counsel has consented to this request.

10. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
December 9, 2014



Andrew J. DeFilippis
Assistant United States Attorney
(212) 637-2231