

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID EBRAHIMZADEH

Criminal No. 25-cr-10455-RGS

ASSENTED-TO MOTION FOR ALTERNATIVE DISCOVERY SCHEDULE

Pursuant to Local Rule 116.1(e) and (f), the United States of America, with the assent of the defendant, requests that the Court adopt an alternative automatic discovery schedule, under which an initial production is due Friday, January 16, 2026, and automatic discovery is completed by Friday, February 20, 2026.

Automatic discovery in this matter is expected to involve the production of over 1.3 million pages of documents. The government began preparation of this production well before the defendant was charged and is on track to produce the initial 1.3 million pages of documents within the next week, but, due to delays with its vendor and the holidays, does not anticipate being able to complete this process by the current deadline of January 9. Accordingly, the government requests until January 16, 2026 to make its initial, very substantial production, which will include an index. The government anticipates seeking a protective order prior to this date as well.

The government anticipates making at least one supplemental production thereafter to complete automatic discovery, and expects needing approximately one month to do so. Accordingly, the government requests until February 20, 2026 to complete automatic discovery. Should additional modifications be needed, the government will promptly alert the defense and the Court.

WHEREFORE, the government requests that the Court adopt an alternative automatic discovery schedule, under which an initial production is due January 16, 2026 and automatic discovery is completed by February 20, 2026. Counsel for the defendant has assented to this motion.

Respectfully submitted,

UNITED STATES OF AMERICA
By its attorney,

LEAH B. FOLEY
United States Attorney

/s/ Elianna J. Nuzum
Elianna J. Nuzum
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Dated: January 9, 2026

LOCAL RULE 7.1(A)(2) CERTIFICATION

I hereby certify that, consistent with Local Rule 7.1(a)(2), the parties have conferred and attempted in good faith to resolve or narrow the issues presented in this motion, and the defendant, through counsel, has assented to this motion.

/s/ Elianna J. Nuzum
Elianna J. Nuzum

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Elianna J. Nuzum

Elianna J. Nuzum

Assistant United States Attorney

Dated: January 9, 2026