

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID EBRAHIMZADEH

Criminal No. 25-cr-10455-RGS

ASSENTED-TO MOTION TO EXTEND
DEADLINE TO COMPLETE AUTOMATIC DISCOVERY

Pursuant to Local Rule 116.1(e) and (f), the United States of America, with the assent of the defendant, requests that the Court amend the alternative automatic discovery schedule that it previously adopted, and permit the government until April 24, 2026 to complete automatic discovery in this matter.

In support of this motion, the government states that on January 21, 2026, the government produced over 2.1 million pages of discovery. The government anticipates making at least one supplemental production. The government had hoped to be able to complete that production by February 20. However, given the scope of the material collected in this case, the fact that the undersigned AUSA took over the prosecution of this matter after the original AUSA left the office, and the undersigned AUSA's other responsibilities, the process is taking longer than anticipated. Accordingly, the government requests an additional two months, until April 24, 2026, to complete automatic discovery. The government has conferred with counsel for the defendant, who assents to this request.

WHEREFORE, the government requests that the Court amend the alternative automatic discovery schedule, and extend the deadline for completion of automatic discovery until April 24, 2026.

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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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: February 19, 2026