

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

vs.

SARGIS URUMIEH,

No. 1:24-cr-00424

Judge Jeremy C. Daniel

AGREED MOTION FOR EXTENSION OF TIME FOR REZA SAFAEEJAVED
TO FILE HIS PETITION PURSUANT TO 21 U.S.C. §853(n)(2)

NOW COMES the UNITED STATES OF AMERICA and REZA SAFAEEJAVED, an interested party in this action, by and through their undersigned attorneys, and for their Agreed Motion for an Extension of Time, and respectfully move this Court to enter an Order granting REZA SAFAEEJAVED an extension up to and including November 15, 2026, to file a Petition with this Court for adjudication of interest in the property located at 2911 East Chevy Chase Drive, Glendale, California 91206, in accordance with 21 U.S.C. §853(n)(2). In support of this Motion, REZA SAFAEEJAVED states as follows:

1. Mr. Safaejaved retained Hinshaw and Culbertson, LLP as counsel on or about September 11, 2026.
2. Mr. Safaejaved's counsel hereby requests a 60-day extension of the current deadline of September 16, 2026, to file a Petition under 21 U.S.C. § 853(n)(2), up to and including November 15, 2026. This additional time is needed to further analyze the underlying facts surrounding the forfeiture of the subject property, to

receive and review appropriate documentation from our clients, further discuss this matter with the U.S. Attorney's Office as necessary, and prepare and file the Petition.

3. This is Mr. Safaejaved's first request for additional time to file such a Petition.

4. Counsel for Mr. Safaejaved contacted counsel for the United States of America on September 11, 2026, and the government is unopposed to the relief sought in this motion and is filing this motion as an agreed motion with an accompanying proposed order.

5. This Motion is not brought for any improper purpose and granting this Motion will not prejudice any party, nor will it delay this matter.

For the reasons stated above, it is respectfully requested that this Court enter an order granting Mr. Safaejaved an extension of time, up to and including November 15, 2026, in which to file his Petition for adjudication of interest in the property located at 2911 East Chevy Chase Drive, Glendale, California 91206, in accordance with 21 U.S.C. § 853(n)(2).

RESPECTFULLY SUBMITTED:

/s/ Sarah E. King

Sarah E. King

Hinshaw & Culbertson LLP

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ANDREW S. BOUTROS

United States Attorney

By: /s/ Jeffrey S. Snell

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Dated: September 16, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed and served electronically via the Court's ECF system on all parties receiving ECF notices, on this 16th day of September 2026.

/s/ Jeffrey S. Snell