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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. OLEG GREGORVICH FURSOV, Defendant.	CASE NO. 2:25-CR-0191 DJC STIPULATION REGARDING EXCLUDABLE TIME PERIODS UNDER SPEEDY TRIAL ACT; FINDINGS AND ORDER DATE: October 23, 2025 TIME: 9:00 a.m. COURT: Hon. Daniel J. Calabretta.

STIPULATION

1. By previous order, this matter was set for status on October 23, 2025.

2. By this stipulation, defendant now moves to continue the status conference until December 11, 2025, at 9:00 a.m., and to exclude time between October 23, 2025, and December 11, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced more than 10,000 pages of discovery consisting of financial documentation, audio recordings, and investigative reports. Included the discovery is a complex tracing table. All of this discovery has been produced directly to defense counsel. In order to produce relevant PII, much of the discovery was produced pursuant to a protective order.

b) Counsel for defendant Oleg Fursov desires additional time to review discovery,

research the charge and potential defenses, conduct independent investigation, and consult with his client.

c) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of October 23, 2025 to December 11, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 20, 2025

ERIC GRANT
United States Attorney

/s/ JESSICA DELANEY
JESSICA DELANEY
Assistant United States Attorney

Dated: October 20, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
Oleg Gregorvich Fursov

ORDER

IT IS SO FOUND AND ORDERED this 20th day of October, 2025.

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE