

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC,

Defendant.

CRIMINAL NO. 25-CR-083 (ACR)

JOINT STATUS REPORT AND MOTION TO TOLL TIME

The United States of America and Defendant EWorldTrade, LLC, by and through their respective undersigned counsel, (collectively the “Parties”), hereby submit this Joint Status Report (JSR) pursuant to the Court’s instructions on June 4, 2025, directing the Parties to inform the Court through a JSR in advance of the status conference currently scheduled for September 4, 2025, if the Parties expect to resolve the case short of a trial but have not yet reached such a resolution.

The Parties have conferred about a resolution, including in two in-person meetings, and expect to resolve the case without a trial. But given the cross-border nature of this case and the multitude of issues to be navigated before a resolution, the Parties anticipate further negotiations that will take time. As such, the Parties jointly request that the Court schedule a trial date during the month of May 2026, specifically May 4, May 11, or May 18, 2026. The Parties will notify the Court as soon as an agreement is reached and request a hearing date accordingly.

The Parties also request that the Court toll the Speedy Trial clock until the date the Court sets for trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). The ends of justice served by tolling the Speedy Trial clock until trial outweigh the interest of the public and the Defendant in a speedy trial. Such time is necessary for the Parties to continue and conclude negotiations for resolving the case, and, in the event that those negotiations fail, such time is necessary to allow the Parties

to prepare for trial. A failure to grant such a continuance may result in a miscarriage of justice and would deny the Parties reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

Respectfully submitted this 29th day of August, 2025, by:

MARLON COBAR
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[Proposed] ORDER

Upon considering the parties' Joint Status Report and Motion to Toll Time, dated August 29, 2025, it is hereby ordered that the trial in this case will commence on May _____, 2026; and for the purpose of computing the time within which the trial must commence, the period from September 4, 2025, through May _____, 2026, shall be excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv), to afford the parties additional time to continue discussions to reach a resolution without trial and, if necessary, prepare for trial.

DATED: _____

HON. ANA C. REYES
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA