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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,

Plaintiff,

vs.

Luis Ortega and Jeremie Sowerby,

Defendants.

Case No. CR-23-01321-PHX-SMB

**DEFENDANT JEREMIE
SOWERBY'S UNOPPOSED
MOTION TO DESIGNATE CASE
AS COMPLEX**

Defendant Jeremie Sowerby respectfully moves this Court, pursuant to Local Criminal Rule 16.2, to designate this matter a “complex case” within the meaning of 18 U.S.C. § 3161(h)(7)(B)(ii). Neither the government nor codefendant Luis Ortega oppose this motion.

Excludable delay under 18 U.S.C. § 3161(h)(7)(B)(ii) will occur as a result of this motion or an order based thereon.

MEMORANDUM

Mr. Sowerby was indicted on September 19, 2023, and arrested on September 22. He had a detention hearing on November 2, 2023 and currently remains in custody with a continued detention hearing scheduled for November 28, 2023.

This case is plainly sufficiently “complex” or “unusual” to justify a complex case designation, as the government alleges multiple fraudulent schemes involving over \$7 million,

1 which will involve a substantial volume of discovery and complicated factual issues covering
2 several years. Discovery will include items seized by the government pursuant to a least one
3 search warrant and materials the government obtained by grand jury subpoenas. The
4 government is expected to begin producing these documents shortly, but has yet to provide
5 any discovery. Also, as long as Mr. Sowerby remains in custody, he and his counsel will face
6 additional challenges preparing for trial, particularly in a document-heavy case such as this one.

7 Mr. Sowerby respectfully requests that the Court designate this case complex for
8 purposes of the Speedy Trial Act. This will ensure that both defendants have time to prepare
9 for trial and allow the Court to establish a consolidated schedule for discovery and motions,
10 which will maximize the efficiency and effectiveness of the process, and permit the resolution
11 of anticipated trial management issues such as a potential severance of counts or parties. The
12 parties will submit a proposed scheduling order after the Status Conference scheduled with
13 the Court tomorrow, November 14, 2023.

14 For these reasons, Mr. Sowerby respectfully requests that the Court grant this
15 unopposed motion to designate this a “complex case.”

16 RESPECTFULLY SUBMITTED this 13th day of November, 2023.

17 WEISS BROWN

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19 By: /s/ Alan S. Baskin
20 Alan Baskin
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CERTIFICATE OF SERVICE

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I hereby certify that on November 13, 2023, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF system for filing.

/s/ Cristina McDonald

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