

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 25-mj-30353

v.

D-1 Yunqing Jian,

Defendant.

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STIPULATION TO ADJOURN PRELIMINARY HEARING

The United States of America and the defendant, Yunqing Jian, by and through her undersigned attorneys, respectfully stipulate to adjourn the preliminary hearing in this case from June 17, 2025, to August 18, 2025, at 1:00 p.m.. The parties are currently engaged in plea negotiations and request this additional time so that they can continue engaging in plea negotiations. The parties also request this additional time to allow the defendant reasonable time necessary for effective preparation, taking into account the exercise of due diligence, including the review of discovery. The parties also stipulate and agree that the period of time in which an indictment or information may be filed will be tolled until August 18, 2025, because

this time period constitutes excludable delay pursuant to Title 18, United States Code, Section 3161(h)(7), for the reasons cited above. *See United States v. Dunbar*, 357 F.3d 582, 593 (6th Cir. 2004).

Respectfully submitted,

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Dated: June 16, 2025

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ORDER TO ADJOURN PRELIMINARY HEARING

This matter coming before the Court on the parties' stipulation, the Court orders that the preliminary hearing is reset from June 17, 2025, to August 18, 2025, at 1:00 p.m.. For the reasons described in the parties' submission, and after considering the factors listed in § 3161(h)(7)(B), the Court finds that the ends of justice served by granting the parties' requested continuance outweigh the best interests of the public and the defendant in a speedy indictment and that this time period constitutes excludable delay pursuant to Title 18, United States Code, Section 3161(h)(7), because the parties are engaged in plea negotiations and failure to grant the continuance would deny counsel for the defendant the reasonable time necessary

for effective preparation, taking into account the exercise of due diligence.

s/David R. Grand

Hon. David R. Grand
United States Magistrate Judge

Entered: 6/17/25