

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

UNITED STATES OF AMERICA

v.

MICHAEL L. BABICH, et al.,

Defendants.

Criminal No.: 16-CR-10343-ADB

**ASSENTED-TO MOTION OF DEFENDANTS KAPOOR, SIMON, AND ROWAN TO
CONTINUE SELF-SURRENDER DATES TO NOVEMBER 30, 2020**

Defendants Kapoor, Simon, and Rowan (the “Moving Defendants”) are scheduled to report to the custody of the Bureau of Prisons (“BOP”) on September 22, 2020. As this Court is well aware, the COVID-19 pandemic remains unresolved in the United States. Given the ongoing health risk posed by COVID-19, Defendants request a continuance of their self-surrender dates to November 30, 2020. The government assents to this request.

On previous occasions during the pandemic, the Moving Defendants have sought and obtained continuances of their self-surrender dates in roughly two-month increments. The instant request would extend their self-surrender dates by approximately two months and one week, and would set them for the Monday after Thanksgiving.

As in prior requests, the Moving Defendants reserve the right to seek additional continuances of their self-surrender dates based on the state of the pandemic. For its part, the government reserves the right to oppose further continuance requests. On this particular request, however, the parties are in agreement that it should be granted.

Accordingly, the Moving Defendants ask that the Court grant the requested continuance of their self-surrender dates to November 30, 2020.

Dated: September 8, 2020

Respectfully submitted,

/s/ William Fick

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Attorneys for Dr. John Kapoor

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with counsel for the government and that the government assents to the request.

/s/ Kosta S. Stojilkovic
Kosta S. Stojilkovic
Counsel for Dr. John Kapoor

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document will be served on counsel for all parties of record through the ECF system.

/s/ Kosta S. Stojilkovic
Kosta S. Stojilkovic
Counsel for Dr. John Kapoor