

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
V.	§	Criminal No. 4:19-cr-147
	§	
CYRUS ALLEN AHSANI and	§	
SAMAN AHSANI	§	

**UNOPPOSED MOTION TO CONTINUE SENTENCING
OF CYRUS ALLEN AHSANI**

TO THE HONORABLE JUDGE ANDREW S. HANEN:

Defendant Cyrus Allen Ahsani (“Mr. Ahsani”), through the undersigned attorneys of record, hereby moves to continue his sentencing hearing and the related deadlines in this case. Mr. Ahsani respectfully requests a continuance of his sentencing date and the related deadlines for the reasons set forth below, as well as the reasons set forth in the Unopposed Motion to Continue Sentencing filed under seal on December 30, 2022 (Doc. 109) (the “Prior Motion”). Mr. Ahsani incorporates the Prior Motion herein by reference.

Having considered the reasons set forth in the Prior Motion, this Court previously continued Mr. Ahsani’s sentencing to August 21, 2023, and, subsequently, November 18, 2024. (Doc. 124; Doc. 157). Most recently, the Court also extended the related deadlines for submission of the initial presentence investigation report (“PSI”), objections to the PSI, and filing of the final PSI to October 11, 2024; October 25, 2024; and November 8, 2024, respectively. (Doc. 157).

As mentioned in the Prior Motion, Mr. Ahsani is cooperating with the Australian Federal Police (“AFP”) in their ongoing prosecution of David Savage and Russell Waugh in connection with Leighton Offshore Pte Ltd (together, the “Leighton Defendants”). Mr. Ahsani provided in-person testimony during the initial stage of the Leighton Defendants’ committal hearing, which

took place in Australia between November 27, 2023 through December 1, 2023. The committal hearing resumed in September 2024, and Mr. Ahsani has agreed to provide additional testimony in November 2024. Further, Mr. Ahsani has agreed to provide evidence at the trial of the Leighton Defendants, which is anticipated to be scheduled following the conclusion of the resumed 2024 committal hearing.

Continuing Mr. Ahsani's sentencing and related deadlines an additional six (6) months will inure to the mutual benefit of both parties in this case, as well as the Australian government and the interests of justice. As further explained in the Prior Motion, Mr. Ahsani wishes to continue fulfilling his commitment to the Australian government and have his continued, truthful testimony considered by the Court when it imposes his sentence. Likewise, testifying truthfully under oath is a level of cooperation of huge benefit to law enforcement. Therefore, Cyrus Ahsani respectfully requests the Court to continue his sentencing until May 2025 or later.

This request for continuance is not sought for the purpose of delay, but so that justice may properly be done. Counsel for Mr. Ahsani has conferred with counsel for the United States, who has indicated the United States is unopposed to the continuance.

WHEREFORE, PREMISES CONSIDERED, Cyrus Ahsani asks that the Court grant this motion and continue his sentencing hearing and related deadlines for a period of approximately six (6) months.

Respectfully submitted,

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By: */s/ Paul E. Coggins*

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Counsel for Defendant Cyrus Allen Ahsani

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via the Court's electronic filing service on this 7th day of October, 2024.

/s/ Paul E. Coggins

Counsel for Defendant

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for the United States on October 2, 2024, who indicated that the United States is unopposed to the relief sought in this Motion.

/s/ Paul E. Coggins

Counsel for Defendant