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Counsel for Defendant WILL-DARNALL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASSIE WILL-DARNALL,

Defendant.

No. 24-CR-00292 PCP (VKD)

UNOPPOSED MOTION AND ~~[PROPOSED]~~
ORDER TEMPORARILY MODIFYING
CONDITIONS OF PRETRIAL RELEASE

Judge: Hon. Virginia K. DeMarchi

Defendant Cassie Will-Darnall, by and through counsel, respectfully requests that the Court temporarily modify her pretrial release conditions to permit her to travel to Longview, Colorado, for a ski trip from December 17 to 23, 2025. The purpose of Ms. Will-Darnall's travel is a personal vacation with her minor child. Counsel has conferred with Pretrial Services Officer Yaneyla Arevalo-Arellano and Assistant United States Attorney Sarah Griswold, and neither objects to this modification.

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1 Dated: December 2, 2025

JODI H. LINKER
FEDERAL PUBLIC DEFENDER

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3 _____/s/_____
4 VARELL L. FULLER
5 Assistant Federal Public Defender

6 **[PROPOSED] ORDER**

7 GOOD CAUSE APPEARING, upon the defendant's unopposed motion, IT IS HEREBY
8 ORDERED that the defendant's pretrial release conditions are temporarily modified to permit
9 the defendant to travel from San Jose to Longview, Colorado from December 17, 2025 to
10 December 23, 2025.
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12 All other conditions are to remain in full effect.

13 IT IS SO ORDERED.

14 DATED: December 2, 2025

Virginia K. DeMarchi
15 THE HONORABLE VIRGINIA K. DEMARCHI
16 United States Magistrate Judge
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