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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

YOLANDA BUTLER, LEGERRIUS HOLT,
and QUAMAIN MASSEY,

Defendants.

CASE NO. 2:25-CR-00179-DAD

STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUSION OF TIME
UNDER SPEEDY TRIAL ACT FINDINGS AND
ORDER

DATE: July 27, 2026
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its attorney of record, Nchekube Onyima, Special Assistant United States Attorney, and defendants Yolanda Butler, Legerrius Holt, and Quamaine Massey both individually and by and through their counsels of record, Hootan Baigmohammadi, Kresta Daly, and Michael Hansen, hereby stipulate as follows:

1. By previous order this matter was set for status on December 29, 2025, and excluded time from September 30, 2025, through December 29, 2025, under Local Code T4. Doc. 20.
2. By previous order this matter was set for status on March 16, 2026, and excluded time from December 29, 2025, through March 16, 2026, under Local Code T4. Doc. 31.
3. By previous order this matter was set for status on July 27, 2026, and excluded time through March 16, 2026, through July 27, 2026. In the Order, the Court included that “no further continuances of the of the status conference in this case will be granted absent a compelling showing of

1 good cause". Doc. 33.

2 4. By this stipulation, the parties now move to continue the status conference until
3 September 21, 2026, and to exclude time between July 27, 2026, and September 21, 2026, under Local
4 Code T4.

5 5. The parties agree and stipulate, and request that the Court find the following:

6 a) There is good cause for the Court to grant the requested continuance.

7 b) Counsel for the Massey, government's counsel, and the government's case agents
8 assigned to this case have a meeting scheduled for July 23, 2026. The purpose of the meeting is
9 for the government's case agents to present evidence from the discovery previously issued to
10 defendants' counsels that support the charges against Massey. Following the meeting, counsel
11 for Massey will need additional time to review the evidence and discuss possible resolution with
12 his client.

13 c) Counsel for Holt, government's counsel, and the government's case agents
14 assigned to this case have a meeting scheduled for July 27, 2026. The purpose of the meeting is
15 for the government's case agents to present evidence from the discovery previously issued to
16 defendants' counsels that support the charges against Holt. Following the meeting, counsel for
17 Holt will need additional time to review the evidence and discuss possible resolution with her
18 client.

19 d) Counsel for Butler, government's counsel, and the government's case agents
20 assigned to this case have a meeting scheduled for August 5, 2026. The purpose of the meeting
21 is for the government's case agents to present evidence from the discovery previously issued to
22 defendants' counsels that support the charges against Butler. Following the meeting, counsel for
23 Butler will need additional time to review the evidence and discuss possible resolution with his
24 client.

25 e) Due to the volume of discovery in this case (over 60,000 pages), the upcoming
26 meetings are necessary to assist defendant's counsels with identifying the pertinent discovery in
27 this case, rather than leaving defendant's counsels to sift through 60,000 pages of discovery
28 without direction.

1 f) Due to the upcoming meetings and the nature of the discovery in this case,
2 defendants' counsels require additional time to review the evidence in this case, discuss potential
3 resolution with their clients, and otherwise prepare for trial.

4 g) Defendants' counsels believe that failure to grant the above-requested
5 continuance would deny them the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 h) The government does not object to the continuance.

8 i) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendants in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 j) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of July 27, 2026 to September 21,
13 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
14 T4] because it results from a continuance granted by the Court at defendants' request on the basis
15 of the Court's finding that the ends of justice served by taking such action outweigh the best
16 interest of the public and the defendant in a speedy trial.

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6. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludible from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 22, 2026

ERIC GRANT
United States Attorney

/s/ NCHEKUBE ONYIMA
NCHEKUBE ONYIMA
Special Assistant U.S. Attorney

Dated: July 22, 2026

/s/HOOTAN BAIGMOHAMMADI
HOOTAN BAIGMOHAMMADI
Counsel for Defendant
Yolanda Buter

Dated: July 22, 2026

/s/KRESTA DALY
KRESTA DALY
Counsel for Defendant
Legerrius Holt

Dated: July 22, 2026

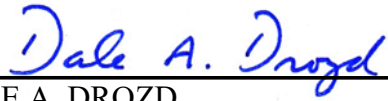
/s/MICHAEL HANSEN
MICHAEL HANSEN
Counsel for Defendant
Quamaine Massey

ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for July 27, 2026 is continued to September 21, 2026, at 9:30 a.m. and time is excluded between July 27, 2026, and September 21, 2026, under Local Code T4. **However, no further continuances of the of the status conference in this case will be granted absent a compelling showing of good cause.**

IT IS SO ORDERED.

Dated: July 23, 2026


DALE A. DROZD
UNITED STATES DISTRICT JUDGE