JODI H. LINKER
Federal Public Defender
VARELL L. FULLER
Assistant Federal Public Defender
55 S. Market Street, Suite 820
San Jose, CA 95113
Telephone: (408) 291-7753
Varell_Fuller@fd.org

Counsel for Defendant WILL-DARNALL

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. CASSIE WILL-DARNALL, Defendant.	No. 24-CR-00292 PCP (SVK) UNOPPOSED MOTION AND [PROPOSED] ORDER TEMPORARILY MODIFYING CONDITIONS OF PRETRIAL RELEASE Judge: Hon. Susan van Kuelen

Defendant Cassie Will-Darnall, by and through counsel, respectfully requests that the Court temporarily modify her pretrial release conditions to permit her travel to Groveland, California, located in the Eastern District of California, from June 26, 2024, to June 30, 2024, to perform maintenance on her property. Additionally, Ms. Will-Darnall requests that the Court modify her conditions of release to permit her to travel to Reno, Nevada, from July 12, 2024, to July 14, 2024, to attend a birthday celebration.

Counsel for Ms. Will-Darnall has conferred with Pretrial Services Officer Emily Sanchez and Assistant United States Attorney Sarah Griswold, and they do not object to this modification.

//

Dated: June 25, 2024

JODI H. LINKER
FEDERAL PUBLIC DEFENDER

_____/s/_____
VARELL L. FULLER
Assistant Federal Public Defender

[PROPOSED] **ORDER**

GOOD CAUSE APPEARING, upon the defendant's unopposed motion, IT IS HEREBY ORDERED that the defendant's pretrial release conditions are temporarily modified to permit the defendant to travel from San Jose to the Eastern District of California, from June 26, 2024, to June 30, 2024.

IT IS HEREBY FURTHER ORDERED that the defendant's pretrial release conditions shall also be temporarily modified to permit the defendant to travel from San Jose to Reno, Nevada, from July 12, 2024, to July 14, 2024.

All other conditions are to remain in full effect.

IT IS SO ORDERED.

DATED: _____

_____
THE HONORABLE SUSAN van KUELEN
United States Magistrate Judge