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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA	(	CASE NO. 5:24-cr-00292-PCP-1
	(	
PLAINTIFF	(	JUDGE P. CASEY PITTS
	(	
-V-	(	MOTION TO EXTEND
	(	SELF-SURRENDER DATE
CASSIE WILL-DARNALL	(	
	(	
DEFENDANT	(	

Now comes the Defendant, Cassie Will-Darnall, or pro se, and respectfully moves this Honorable Court for an Order extending the Defendant's self-surrender date to the custody of the Bureau of Prisons. In support thereof, Defendant states as follows:

1. Procedural Background

The Court sentenced Defendant to a term of imprisonment of 18 months, and ordered Defendant to self-surrender to the Bureau of Prisons on 01/12/2026.

Defendant has fully complied with all conditions of release and has appeared as ordered throughout these proceedings.

2. Legal Authority

This Court retains authority to modify the date and manner of execution of its sentence. The 9th Circuit held that "[i]f the circumstances warrant, a district court may delay the imposition of sentence or extend the time to surrender to the BOP."See United States v. United States v. Fower No. 21-50007, 2022 (9th Circuit, April 4, 2022), see also 18 U.S.C. § 3143(a).

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3. Good Cause Exists for an Extension

Good cause exists for a brief extension of the surrender date due to the following circumstances:

The primary caregiver for Sandra Will unexpectedly and abruptly terminated her employment, leaving Ms. Will without any in-home assistance or support. As a result, Sandra Will is currently without a caregiver and is unable to safely manage her daily needs independently. At present, Cassie Will-Darnall is the sole individual providing necessary care and supervision

Ms. Will-Darnall requires additional time to secure, vet, and properly train a replacement caregiver to ensure continuity of care and avoid placing her mother at risk. An extension of the surrender date is respectfully requested to allow Ms. Will-Darnall to stabilize her mother's caregiving situation before incarceration.

Absent a brief extension, Ms. Will-Darnall's immediate surrender would leave Sandra Will without essential care, placing her health and safety at substantial risk. This request is narrowly tailored and made in good faith, and is consistent with the factors set forth in 18 U.S.C. § 3553(a), including the history and characteristics of the defendant and the need to avoid unnecessary hardship to a vulnerable dependent, while preserving the integrity of the Court's sentence and ensuring Ms. Will-Darnall's timely and orderly surrender once appropriate care is in place.

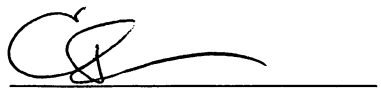
Defendant is not seeking to delay execution of sentence indefinitely, but only a reasonable 60 day extension to ensure orderly compliance with the Court's judgment. Defendant poses no risk of flight or danger to the community and will surrender as ordered by the Court.

4. Requested Relief

Defendant respectfully requests that the Court extend the self-surrender date from 01/12/2026 to time 60 days from your report date, or such other date as the Court deems just and appropriate.

WHEREFORE,Defendant, Cassie Will-Darnall respectfully prays that this Court grant the Motion and extend the Defendant's self-surrender date an additional sixty 60 days.

Respectfully Submitted,



Cassie Will-Darnall
111 Belwood Gateway Los Gatos
CA 95032
(408) 596-1511
Lggirl16@yahoo.com
Pro Se

This packet demonstrates the following:

1. My mother medically requires a caregiver.
2. She does not currently have one.
3. I am proactively searching for one through licensed agencies and private caregivers.
4. She needs daily assistance for safety, technology, and legal/medical tasks.
5. This documentation reflects legitimate, good-faith efforts to secure proper care.

Respectfully submitted,
Cassie Will Darnall



Caregiver Need & Active Search Evidence Packet

1. Functional Needs Assessment Summary

Completed by Former Caregiver Agency :

This functional assessment reflects the typical findings from a licensed Home Health Agency or Geriatric Care Manager:

ADLs she needs assistance with:
- Dressing
- Bathing
- Supervision for safety
- Medication reminders

IADLs she needs assistance with:
- Technology use (email, online systems, documents)
- Managing legal paperwork
- Scheduling and understanding appointments
- Financial or complex decision making

Recommendation:
Client requires daily support and a consistent caregiver to ensure safety and proper handling of legal/medical matters.

3. Incident Log (Starting October 2025)

• **10/03/2025** – Difficulty understanding voicemail from attorney; needed step-by-step explanation.
• **10/08/2025** – Became confused while paying a bill online; unable to navigate website without full guidance.
• **10/14/2025** – Misplaced important legal documents; later found them in the kitchen with food items.
• **10/19/2025** – Forgot how to use television remote; unable to change input or find news channel.
• **10/23/2025** – Repeatedly asked the same question about lawsuit deadlines within one hour.
• **10/27/2025** – Attempted to call attorney but dialed random contacts instead; became frustrated and upset.
• **10/30/2025** – Mistook scam email for official court notice; required intervention to prevent response.

• **11/01/2025** – Forgot scheduled medical appointment despite reminders; needed escort and re-explanation.
• **11/03/2025** – Confused by text message from Medicare; believed benefits were being cut.
• **11/07/2025** – Unable to locate medications; required help organizing daily pillbox.
• **11/09/2025** – Became anxious after misinterpreting a routine notice from insurance as a termination letter.
• **11/13/2025** – Could not recall passwords for banking; locked herself out of online account.
• **11/16/2025** – Forgot whether she ate breakfast; attempted to take medication twice.

• **11/19/2025** – Needed help understanding a court date reminder letter; believed it was a demand notice.
• **11/22/2025** – Confused when attempting to print documents; printer jam escalated her anxiety.
• **11/25/2025** – Misidentified phone scam caller as a government agency; nearly shared personal information.
• **11/28/2025** – Forgot how to check voicemail; required full guidance and emotional reassurance.
• **11/30/2025** – Could not understand difference between attorney retainer letter and invoice; became distressed.

• **12/03/2025** – Forgot to attend scheduled lab appointment; appointment had to be rescheduled and transportation arranged.
• **12/07/2025** – Became confused by prescription refill notice; believed medication had been discontinued.
• **12/11/2025** – Could not turn on the microwave; required supervision to ensure safety.

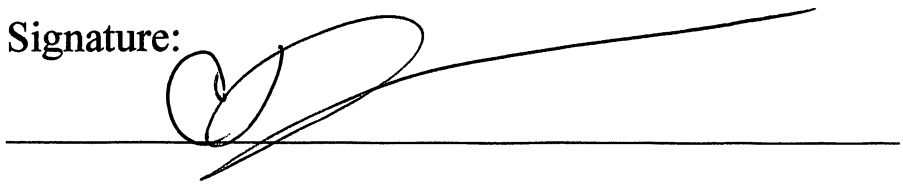
Section B — Evidence that She Has No Current Caregiver
DECLARATION OF CASSIE WILL DARNALL

I, Cassie Will Darnall, declare under penalty of perjury:

1. My mother, Sandra Will, does not currently have a caregiver. Her caregiver left Dec 9th 2025.
2. She is not receiving any in-home support services.
3. There is no caregiver under contract, no agency providing care, and she receives no daily care aside from my assistance.
4. Due to her needs, I am the only person helping her manage technology, legal tasks, and daily responsibilities.
5. I am actively seeking a caregiver on her behalf and have contacted multiple agencies.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12/12/2025
Signature:



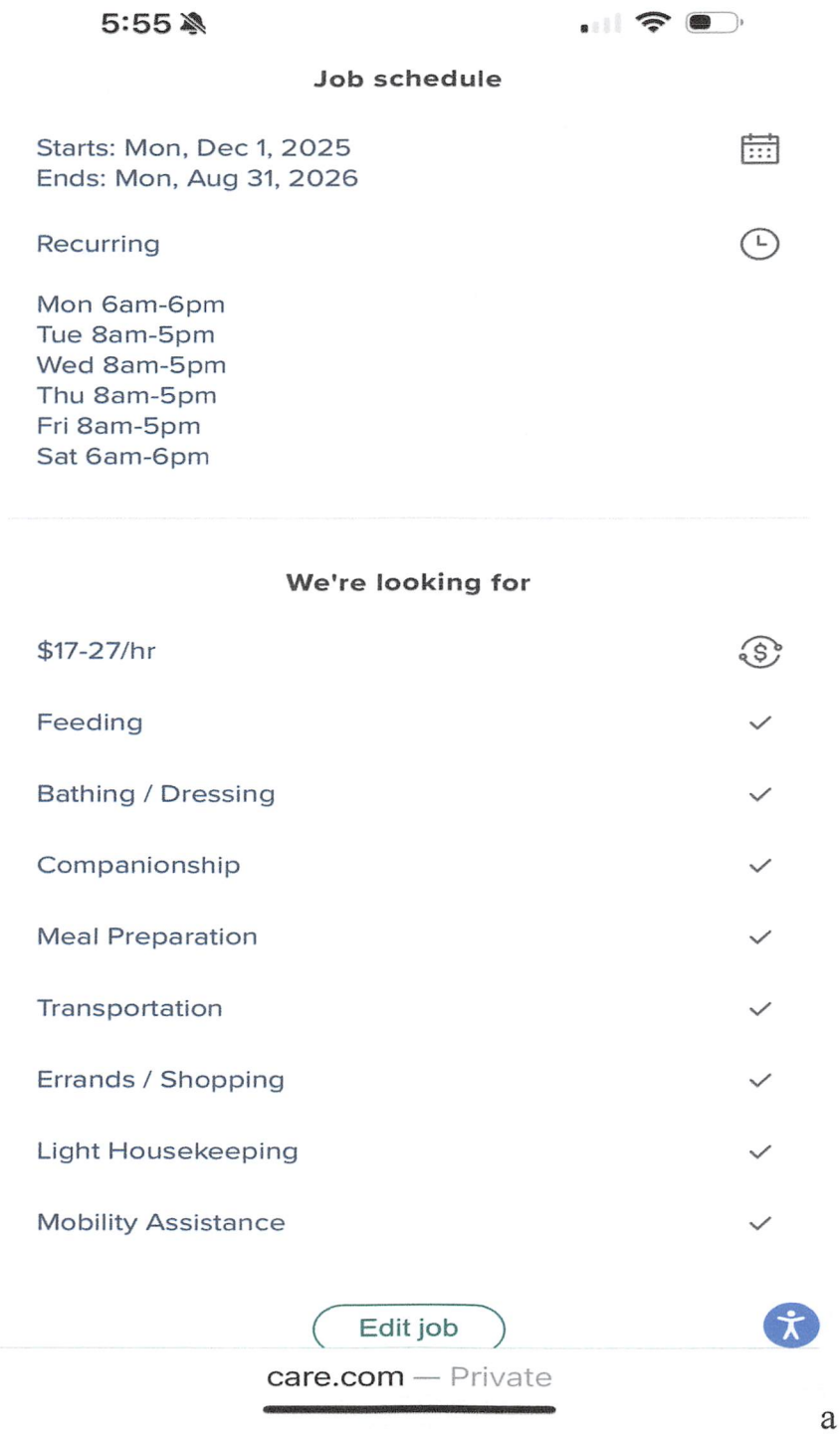
DECLARATION OF SANDRA WILL

I, SANDRA WILL, declare that I do not have a caregiver at this time. No agency or individual is providing daily assistance to me. Cassie is reaching out to agencies and referrals to find a helper for me.

I understand that my daughter is helping me search for an appropriate caregiver, and currently is my caregiver.

Date: 12/12/2025
Signature: _____

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