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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. CASSIE WILL-DARNALL, Defendant.	Case No. CR 24–00292 PCP **DEFENDANT'S MOTION TO EXTEND SELF-SURRENDER DATE; [PROPOSED] ORDER**

MOTION

Defendant Cass Will-Darnall, by and through counsel, respectfully requests that the Court extend her self-surrender date, currently scheduled for January 12, 2026, by 60 days to March 13, 2026. The reason for this request is that the caregiver for Ms. Will-Darnall's mother unexpectedly quit, leaving Ms. Will-Darnell as the sole caregiver. Ms. Will-Darnall requests this extension to allow her time to hire and train a replacement caregiver.

On September 24, 2025, this Court sentenced Ms. Will-Darnall to 18 months in custody. *See* Dkt. No. 98. She has been designated to the Victorville Satellite Camp.

Ms. Will-Darnall's mother, Sandra Will, is unable to care for herself independently. She is unable to dress, bathe, or manage her medications without assistance. In addition, she requires

assistance with tasks such as scheduling and keeping track of appointments, paying bills, making telephone calls, and interpreting email and voicemail messages. *See* Declaration of Cassie Will-Darnall and accompanying documents, attached hereto as Exhibit A. Ms. Will-Darnall is actively working to hire and train a replacement caregiver for her mother. *See id.* In the meantime, Ms. Will-Darnall is the sole caregiver. *Id.* A 60-day extension of Ms. Will-Darnall's self-surrender date should provide enough time for her to hire and train a new caregiver before beginning her prison term.

For the reasons set forth above, Ms. Will-Darnall respectfully requests that the Court grant a 60-day extension of her self-surrender date to March 13, 2026. In addition, it is requested that this motion be considered and decided on the papers without the need for a hearing. If the Court determines that a hearing is necessary, defense counsel is available on January 14, 2026.

Dated: January 6, 2026

Respectfully submitted,

JODI LINKER
Federal Public Defender
Northern District of California

/S
VARELL L. FULLER
Assistant Federal Public Defender

[PROPOSED] ORDER

GOOD CAUSE APPEARING, upon motion of defendant Cassie Will-Darnall, IT IS HEREBY ORDERED that the defendant's self-surrender date is extended from January 12, 2026, to March 13, 2026.

IT IS FURTHER ORDERED that Ms. Will-Darnall shall surrender on March 13, 2026, to the Bureau of Prisons facility to which she has been designated, Victorville Satellite Camp, or the the U.S. Marshal's Service office in San Jose, California, no later than 2:00 p.m.

IT IS SO ORDERED.

Dated:

THE HONORABLE P. CASEY PITTS
United States District Court Judge