JODI 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
Fax: (408)-291-7399
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, v. CASSIE WILL-DARNALL, Defendant.	No. CR 24-00292 PCP STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING

STIPULATION

The parties, acting through their respective counsel, hereby stipulate, subject to the Court's approval, that the status hearing currently set for July 31, 2024, at 10:00 a.m., be continued to August 7, 2024, at 10:00 a.m., and set for a possible change of plea. The reason for the requested continuance is the defense counsel requires additional time to meet and confer with Ms. Will-Darnall about the proposed negotiated disposition and to effectively prepare.

Accordingly, the parties stipulate and agree that time may be excluded under the Speedy Trial Act between July 31, 2024, and August 7, 2024, for effective preparation of counsel and in the interest of justice. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO STIPULATED.

Dated: July 25, 2024

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

Dated: July 25, 2024,

ISMAIL J. RAMSEY
United States Attorney
_____/s/_____
SARAH E. GRISWOLD
Assistant United States Attorney

[PROPOSED] **ORDER**

GOOD CAUSE APPEARING, and upon stipulation of the parties, IT IS HEREBY ORDERED that the status hearing currently set for July 31, 2024, at 10:00 a.m., shall be continued to August 21, 2024, at 10:00 a.m. and set for a possible change of plea.

IT IS FURTHER ORDERED that the time from July 31, 2024, through and including August 7, 2024, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

THE COURT FINDS that failing to exclude the time from July 31, 2024, through and including August 7, 2024, would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §3161(h)(7)(B)(iv).

THE COURT FURTHER FINDS that the ends of justice served by excluding the time from July 31, 2024, through and including August 21, 2024, from computation under the Speedy

Trial Act outweigh the interests of the public and the defendant in a speedy trial. The Court therefore excludes this time pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: _____

_____
HONORABLE P. CASEY PITTS
United States District Judge