ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

SARAH E. GRISWOLD (CABN 240326)
Assistant United States Attorney

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5061
FAX: (408) 535-5081
sarah.griswold@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. CASSIE WILL-DARNALL, Defendant.	CASE NO. 5:24-CR-292 PCP STIPULATION AND [PROPOSED] ORDER TO EXCLUDE TIME FROM AUGUST 21 2024, THROUGH SEPTEMBER 11, 2024, FROM THE SPEEDY TRIAL ACT CALCULATION UNDER 18 U.S.C. § 3161(h)(7)(A) AND (h)(7)(B)(iv)

On August 21, 2024, the parties appeared before the Honorable P. Casey Pitts for a status conference in this case. At this hearing, the Court set a change of plea hearing for September 11, 2024. Defense counsel needs additional time to review discovery, conduct his own investigation, and prepare for the change of plea hearing. Defense counsel requested a continuance and exclusion of time. The Court granted the request. The parties hereby submit this joint stipulation to effectuate the Court's order to exclude time from August 21, 2024, through August 5, 2024, from the Speedy Trial Act calculation.

The parties hereby stipulate that the time from August 21, 2024, through September 11, 2024, should be excluded from the period of time within which the defendants' trial must commence pursuant to the Speedy Trial Act in order to allow defense counsel sufficient time to prepare effectively, taking

into account the exercise of due diligence. Furthermore, the parties stipulate that the ends of justice served by granting the request outweigh the best interest of the public and the defendants in a speedy trial.

Respectfully submitted,

DATED: August 21, 2024

ISMAIL J. RAMSEY
United States Attorney

/s/
SARAH E. GRISWOLD
Assistant United States Attorney

JODI LINKER
Federal Public Defender

DATED: August 21, 2024

/s/
VARELL L. FULLER
Assistant Federal Public Defender
Counsel for Defendant Cassie Will-Darnall

ORDER

Based upon the representations made at the status conference on August 21, 2024, and in the parties' stipulation above, and for good cause shown, the COURT HEREBY ORDERS that the time between August 21, 2024, and September 11, 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 defense counsel needs additional time to review discovery and investigate this matter, and that the failure to grant this request would unreasonably deny defense counsel reasonable time to effectively prepare, taking into account the exercise of due diligence. Furthermore, the Court finds that the ends of justice served by granting the request outweigh the best interest of the public and the defendants in a speedy trial and in the prompt disposition of criminal cases. The Court therefore excludes this time pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

DATED: August ___, 2024

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HON. P. CASEY PITTS
UNITED STATES DISTRICT JUDGE