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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) MOTION AND [PROPOSED] ORDER TEMPORARILY MODIFYING CONDITIONS OF PRETRIAL RELEASE Judge: Hon. Susan van Kuelen

MOTION

Defendant Cassie Will-Darnall, by and through counsel, respectfully requests that the Court temporarily modify her pretrial release conditions to permit her to travel to Arizona from March 19, 2025, to March 26, 2025. Ms. Will-Darnall respectfully requests permission to travel to Scottsdale, Arizona, to attend baseball spring training with her minor son and celebrate her recently deceased uncle's life. On May 30, 2024, Ms. Will-Darnall appeared on a summons, waived indictment in this matter, and made her initial appearance. Dkt. No. 3. She was ordered released on a $50,000 unsecured bond and surrendered her passport to Pretrial Services. On January 15, 2025, Ms. Will-Darnall entered an open plea. Sentencing in this matter is scheduled for April 23, 2025. On February 8, 2025, Ms. Will-Darnell's maternal uncle, Nicholas Peter

Skalkos, Jr. passed in Maine, and a service was later held in Connecticut. Counsel for Ms. Will-Darnell is reasonably informed that Mr. Skalkos was a baseball fan and regularly attended spring training games in Scottsdale, Arizona, with Ms. Will-Darnall and her son. The purpose of Ms. Will-Darnall's trip is to attend spring training and celebrate her deceased uncle's life with her minor child. Ms. Will-Darnall has no prior criminal history, and has been on pretrial release for approximately nine months without incident. She has attended all court proceedings as ordered and has complied with her pretrial release conditions as ordered.

Counsel for Ms. Will-Darnall has conferred with Pretrial Services Officer Yaneyla Arevalo Arellano, and she does not object to this modification. Defense counsel also conferred with Special Assistant United States Attorney Johnny James, and the government is opposed to this temporary modification. Given the government's position, the defense is prepared to further address Ms. Will-Darnall's travel request at a hearing on the matter, should the court determine a hearing is necessary. For the foregoing reasons, the defense respectfully requests that the court grant Ms. Will-Darnall's travel request.

Dated: March 6, 2025,

JODI H. LINKER
FEDERAL PUBLIC DEFENDER

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

[PROPOSED] **ORDER**

GOOD CAUSE APPEARING, upon the defendant's 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 Arizona, from March 19, 2025, to March 26, 2025.

All other conditions are to remain in full effect.

IT IS SO ORDERED.

DATED: _____

_____
THE HONORABLE SUSAN van KUELEN
United States Magistrate Judge