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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 **STIPULATION AND [PROPOSED] ORDER TO CONTINUE SENTENCING HEARING**

STIPULATION

The parties, by and through their respective counsel, hereby stipulate, subject to the Court's approval, that the sentencing hearing currently set for June 11, 2025, at 10:00 a.m., shall be continued to September 3, 2025, at 10:00 a.m. On May 29, 2025, U.S. Probation disclosed the final Presentence Report in this matter. ECF. Dkt. No. 59. The defense respectfully requests the Court continue the current sentencing hearing date to permit the defense additional time to investigate further a Sentencing Guidelines enhancement found by Probation that will affect Mr. Will-Darnall's applicable guideline range. Furthermore, the defense needs additional time to prepare for Ms. Will-Darnall's sentencing hearing. Specifically, defense counsel is researching further mitigation arguments that the defense intends to present at the upcoming sentencing hearing. The parties and Probation respectfully

request the date of September 3, 2025, as that date accommodates the parties and the assigned Probation Officer's respective availability.

For the reasons set forth above, the parties stipulate and agree to continue the sentencing hearing from June 11, 2025, to September 3, 2025.

IT IS SO STIPULATED.

Dated: June 3, 2025

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

Dated: June 3, 2025

CRAIG H. MISSAKIAN
United States Attorney
_____/s/_____
JOHNNY JAMES
Special Assistant United States Attorney

[PROPOSED] ORDER

GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY ORDERED that the sentencing hearing currently set for June 11, 2025, at 10:00 a.m., shall be continued to September 3, 2025, at 10:00 a.m.

IT IS SO ORDERED.

Dated: _____

_____
THE HONORABLE P. CASEY PITTS
United States District Judge