JODI LINKER, Bar No. 230273
Federal Public Defender
Northern District of California
VARELL FULLER, Bar No. 202680
Assistant Federal Public Defender
8th Floor - Suite 820
55 South Market Street
San Jose, CA 95113
Telephone: (408) 291-7753
Facsimile: (408) 291-7399
Email: Varell_Fuller@fd.org

Counsel for Defendant WILL-DARNALL

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 **UNOPPOSED MOTION AND ~~[PROPOSED]~~ ORDER TEMPORARILY MODIFYING CONDITIONS OF PRETRIAL RELEASE**

MOTION

Defendant Cassie Will-Darnall, by and through counsel, respectfully requests that the Court temporarily modify her pretrial release conditions to permit the following travel from San Jose, California:

1) Boston, Massachusetts, located in the District of Massachusetts, from July 7, 2025, to July 10, 2025;
2) Baltimore, Maryland, located in the District of Maryland, from July 11, 2025, to July 13, 2025; and
3) Atlanta, Georgia, located in the Northern District of Georgia, from July 13, 2025, to July

16, 2025.

The purpose of Ms. Will-Darnall's travel is for a personal vacation to attend baseball games in the respective cities. Counsel for Ms. Will-Darnall has conferred with Pretrial Services Officer Yaneyla Arevalo Arellano and Special Assistant United States Attorney Johnny James, and they do not object to this modification.

Dated: June 24, 2025

Respectfully submitted,

JODI LINKER
Federal Public Defender
Northern District of California

/S
VARELL FULLER
Assistant Federal Public Defender

[~~PROPOSED~~] **ORDER**

GOOD CAUSE APPEARING, and upon the defendant's unopposed motion, IT IS HEREBY ORDERED that the defendant's pretrial release conditions are temporarily modified to permit the following travel:

1) Boston, Massachusetts, located in the District of Massachusetts, from July 7, 2025, to July 10, 2025;
2) Baltimore, Maryland, located in the District of Maryland, from July 11, 2025, to July 13, 2025; and
3) Atlanta, Georgia, located in the Northern District of Georgia, from July 13, 2025, to July 16, 2025.

All other conditions of release shall remain in full effect.

IT IS SO ORDERED.

DATED: June 24, 2025

HON. SUSAN VAN KUELEN
United States Magistrate Judge