

Bruce Locke (#177787)
Moss & Locke
4354 Town Center Blvd., #114-59
Eldorado Hills, CA 95762
916-719-3194
Attorneys for Kioni M. Dogan

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES,

No. 16-CR-0199 GEB

Plaintiff,

V.

KIONI M. DOGAN, et. al.,

Defendants.

**STIPULATION AND PROPOSED ORDER
CONTINUING THE STATUS
CONFERENCE SET FOR JUNE 23, 2017
TO AUGUST 25, 2017 AT 9:00 A.M.**

IT IS HEREBY STIPULATED AND AGREED between the defendants, Kioni Dogan, Gloria Harris, and Lavonda Bailey, by and through their undersigned defense counsel, and the United States of America, by and through its counsel, Assistant U.S. Attorney Jared Dolan, that the status conference presently set for June 23, 2017 should be continued to August 25, 2017 at 9:00 a.m., and that time under the Speedy Trial Act should be excluded from June 23, 2017 through August 25, 2017.

The reason for the continuance is that Mr. Locke and other defense counsel need additional time to review the discovery and to conduct investigation. There are over 14,000 pages of discovery and multiple search warrants were executed in this case. At the request of the defense, the government is working on providing a spreadsheet detailing the loss amounts for each defendant. While the defense will continue to review the discovery that has been provided, and conduct their own independent investigation, further information from the government will greatly decrease the amount of analysis required to assess the case and determine what further defense investigation is necessary. The exclusion of time is also necessary to ensure continuity of

1 counsel. Accordingly, the time between June 23, 2017 and August 25, 2017 should be excluded
2 from the Speedy Trial calculation pursuant to Title 18, States Code, Section 3161(h)(7)(B)(iv)
3 and Local Code T-4 for defense preparation. The parties stipulate that the ends of justice served
4 by granting this continuance outweigh the best interests of the public and the defendants in a
5 speedy trial. 18 U.S.C. §3161(h)(7)(A). Mr. Dolan, Mr. Foster and Mr. Wilson have authorized
6 Mr. Locke to sign this pleading for them.

7 DATED: June 14, 2017

/s/ Bruce Locke
BRUCE LOCKE
Attorney for Kioni Dogan

8 DATED: June 14, 2017

/s/ Bruce Locke
For GREGORY FOSTER
Attorney for Gloria Harris

9 DATED: June 14, 2017

/s/ Bruce Locke
For ROBERT WILSON
Attorney for LAVONDA BAILEY

10 DATED: June 14, 2017

/s/ Bruce Locke
For JARED DOLAN
Attorney for the United States

11
12
13
14
15
16
17
18 The Court finds, for the reasons stated above, that the ends of justice served by granting
19 this continuance outweigh the best interests of the public and the defendants in a speedy trial, and,
20 therefore.

21 IT IS SO ORDERED.

22
23 Dated: June 14, 2017

24
25
26 
27 GARLAND E. BURRELL, JR.
28 Senior United States District Judge