MICHELE BECKWITH
Acting United States Attorney
ELLIOT WONG
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. MICHAEL ANTHONY BUTLER, JR., Defendant.	CASE NO. 2:20-CR-182 DAD STIPULATION AND ORDER TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT DATE: July 10, 2025 TIME: 9:00 a.m. COURT: Hon. Daniel J. Calabretta

The United States of America, by and through Assistant U.S. Attorney Elliot Wong, and defendant Michael Anthony Butler, Jr., by and through counsel Shari Rusk, hereby agree and stipulate as follows:

1. On April 21, 2025, this matter was reassigned to the Honorable Daniel J. Calabretta. (ECF 133.) Time had previously been excluded through and including June 30, 2025. (ECF 132.)

2. Upon reassignment and on its own motion, the Court reset the status conference for July 7, 2025. (ECF 134.)

3. The government has re-produced discovery to (recently appointed) defense counsel, which includes thousands of pages of documents. The government has also made available for inspection evidence seized during the investigation, including electronic devices. Good cause exists to allow new counsel time to investigate the allegations underlying the charges in the indictment, review

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

discovery, meet with her client, and otherwise prepare for trial.

4. Based on the above, the parties request that the Court exclude the time between June 30, 2025, to and including July 10, 2025, from the computation of time in which trial must commence under the Speedy Trial Act, pursuant to Local Code T-4. The parties agree that the interests of justice served by excluding time under the Speedy Trial Act, outweigh the best interests of the public and the defendant in a speedy trial. The parties request that the Court adopt the facts set forth herein and order time excluded from June 30, 2025, to and including July 10, 2025 pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4, to allow the defense time to investigate the allegations underlying the charges in the indictment, examine the evidence, confer, and otherwise prepare for trial.

Dated: April 25, 2025

MICHELE BECKWTIH
Acting United States Attorney

By: /s/ ELLIOT WONG
ELLIOT WONG
Assistant United States Attorney

Dated: April 25, 2025

/s/ SHARI RUSK
SHARI RUSK
Counsel for Defendant
Michael Anthony Butler, Jr.

ORDER

IT IS SO ORDERED.

Dated: April 25, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE