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DOUGLAS GREGORY EDWARDS

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, vs. DOUGLAS GREGORY EDWARDS, Defendant.	Case No. 2:20-CR-218-DAD **STIPULATION AND ~~[PROPOSED]~~ ORDER TO MODIFY CONDITIONS OF RELEASE** Judge: Jeremy D. Peterson

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Samuel Stefanki, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Mr. Edwards, that the conditions of release previously set by the Court may be modified as detailed below, and respectfully request the Court to modify the conditions accordingly. The Pretrial Services officer is in agreement with the modification.

The parties specifically stipulate as follows:

1. The detention hearing in this case was heard on July 16, 2020. ECF No. 13. Mr. Edwards was ordered released on a series of conditions. ECF Nos. 14, 15.

2. By stipulation, and with the consent of Pretrial Services, the parties recently requested a change to Mr. Edwards' living situation to relocate him from Oakland to Sacramento. That stipulation was approved by the Court. *See* ECF Nos. 60, 61.

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3. Since this move, Pretrial Services has become aware of availability of bed space at another Sacramento facility that Pretrial Services is very familiar with and which Pretrial Services has deemed suitable for Mr. Edwards. The defense agrees that the new facility is a better environment for Mr. Edwards, and is therefore requesting that Mr. Edwards be allowed to move to the new residence. The government does not oppose the change.

4. The defense therefore respectfully requests that Condition 2 of Mr. Edwards' current Conditions of Release (at ECF No. 60, Attachment 1) be modified to read: "You must reside at a residence in Sacramento pre-approved by Pretrial Services, and not move or absent yourself from this residence for more than 24 hours without the prior approval of the pretrial services officer."

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: October 13, 2022

/s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
DOUGLAS GREGORY EDWARDS

Date: October 13, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ Samuel Stefanki
SAMUEL STEFANKI
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: October 17, 2022

Honorable Jeremy D. Peterson
United States Magistrate Judge