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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 ORDER TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME** Date: September 20, 2022 Time: 9:00 A.M. Judge: Hon. Dale A. Drozd

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 status conference (currently set for September 20, 2022) may be continued to **October 11, 2022, at 9:30 a.m.** The parties specifically stipulate as follows:

1. On August 30, 2022, this matter was recently reassigned to District Judge Dale A. Drozd, and the previously set status conference was reset for September 20, 2022. ECF No. 55.

2. By stipulation, the defense now moves to continue the status conference to October 11, 2022, at 9:30 a.m.

3. The government has produced three productions of discovery, totaling

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approximately 2,000 items of reports, audiovisual files, photographs, and other documents.

4. Defense counsel represents that she requires additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, consult with experts and her client, explore potential resolutions to the case, and otherwise prepare for trial.

5. Defense counsel believes that failure to grant the requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

6. The government does not object to the continuance.

7. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Edwards in a speedy trial and request the Court so to find.

8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between September 20, 2022 and October 11, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Edwards in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: September 15, 2022

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

Date: September 15, 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: **September 16, 2022**

Dale A. Drozd
UNITED STATES DISTRICT JUDGE