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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: October 11, 2022 Time: 9:30 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 October 11, 2022) may be continued to **December 13, 2022 at 9:30 a.m.** The parties specifically stipulate as follows:

1. By prior stipulation, this matter was set for October 11, 2022. ECF No. 57.

2. By stipulation, the defense now moves to continue the status conference to December 13, 2022 at 9:30 a.m.

3. The government has produced three productions of discovery, totaling approximately 2,000 items of reports, audiovisual files, photographs, and other documents.

4. As part of its investigation, the defense has *inter alia* gathered mental health

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records; since the last continuance, has i) discussed this evidence with government counsel to explore potential resolutions to the case and ii) has continued her investigation, research, and trial preparation in this case. Defense counsel represents that she requires additional time to 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. The defense anticipates that, on the December 2022 date, the parties will know whether this case is resolving or being set for trial.

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 October 11, 2022 and December 13, 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: October 4, 2022

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

Date: October 4, 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. Accordingly, the status conference previously scheduled for October 11, 2022 is vacated and rescheduled for December 13, 2022 at 9:30 a.m. The time period between October 11, 2022 and December 13, 2022, inclusive, is hereby excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4).

The undersigned notes that this prosecution was commenced almost 27 months ago and that the status conference has been continued by stipulation of the parties approximately nine times since then. The court's good cause finding for this final continuance of the status conference is in part based upon defense counsel's above representation that the "defense anticipates that, on the December 2022 date, the parties will know whether this case is resolving or being set for trial." No further continuances of the status conference in this action will be granted absent a compelling showing of good cause.

IT IS SO ORDERED.

Dated: **October 5, 2022**

Dale A. Drozd
UNITED STATES DISTRICT JUDGE