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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	Case No. 2:14-cr-00066-JAM
)	2:22-cr-00217-JAM
11 Plaintiff,)	
)	STIPULATION AND ORDER TO
12 vs.)	CONTINUE ADMIT/DENY HEARING AND
)	STATUS CONFERENCE AND EXCLUDE
13 JASON M. CARLSEN,)	TIME
)	
14 Defendant.)	
)	

16 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States
17 Attorney, through Nicholas Fogg, Assistant United States Attorney, attorney for Plaintiff, and
18 Heather Williams, Federal Defender, through Assistant Federal Defender Linda Allison, attorney
19 for defendant Jason Carlsen, that the Admit/Deny Hearing and the Status Conference currently
20 set for January 31, 2023 be continued to February 14, 2023 at 9:00 am and exclude time under
21 Local Code T4.

22 The parties agree and stipulate, and request that the Court find the following:

- 23 a. Counsel are currently in negotiations to resolve this matter. Defense counsel
- 24 requests additional time to review plea agreement with her client.
- 25 b. Defense counsel believes that failure to grant the above-requested continuance
- 26 would deny counsel the reasonable time necessary for effective preparation, taking into account
- 27 the exercise of due diligence.
- 28

1 c. Based on the above-stated findings, the ends of justice served by continuing the
2 case as requested outweigh the interest of the public and the defendant in a trial within the
3 original date prescribed by the Speedy Trial Act.

4 d. For the purposed of computing time under the Speedy Trial Act, 18 U.S.C. §
5 3161, et seq., within which trial must commence, the time period of January 31, 2023 to
6 February 14, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)
7 [Local Code T4] because it results from a continuance granted by the Court at defendant's
8 request on the basis of the Court's finding that the ends of justice served by taking such action
9 outweigh the best interest of the public and the defendant in a speedy trial.

10 Nothing in this stipulation and order shall preclude a finding that other provisions of the
11 Speedy Trial Act dictate that additional time periods are excludable from the period within which
12 a trial must commence.

13 Dated: January 19, 2023

Respectfully submitted,

14 HEATHER E. WILLIAMS
15 Federal Defender

16 /s/ Linda Allison
17 LINDA ALLISON
18 Assistant Federal Defender
19 Attorney for JASON M. CARLSEN

20 Dated: January 19, 2023

PHILLIP A. TALBERT
United States Attorney

21 /s/ Nicholas Fogg
22 NICHOLAS FOGG
23 Assistant United States Attorney
24 Attorney for Plaintiff

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ORDER

IT IS HEREBY ORDERED that the status conference and Admit/Deny hearing set for January 31, 2023 at 9:00 a.m. be continued to February 14, 2023 at 9:00 a.m.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period from the date of this order through February 14, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(1)(D), (h)(7)(A), (B)(iv) and Local Code T4 because it results from a continuance granted by the Court at both parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

Dated: January 19, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE