

THOMAS A. JOHNSON, #119203
Law Office of Thomas A. Johnson
400 Capitol Mall, Suite 2560
Sacramento, California 95814
Telephone: (916) 422-4022

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:23-cr-0080 JAM
)	
Plaintiff,)	STIPULATION REGARDING
)	EXCLUDABLE TIME PERIODS
vs.)	UNDER SPEEDY TRIAL ACT; ORDER
)	
PIR DANISH ALI and)	Date: May 2, 2023
JASON KEITH BRUCE,)	Time: 9:00 a.m.
)	Judge: Hon. John A. Mendez
Defendants.)	

STIPULATION

1. By previous order, this matter was set for status on May 2, 2023.
2. By this stipulation, defendant Jason Bruce now moves to continue the status conference until August 1, 2023, at 9:00 a.m., and to exclude time between May 2, 2023 and August 1, 2023 under Local Code T4. Defendant Pir Danish Ali remains outside the United States and has not yet been arrested or arraigned.
3. Bruce and the government agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 82,841 pages of reports, video and audio recordings, emails, photographs, and other material. In addition, digital device extractions will be produced in discovery and made available for inspection. U.S. Fish and Wildlife Service also has physical evidence available for inspection.

1 Some of this discovery has already been produced and the remainder will be
2 produced directly to defense counsel for Bruce this week.

3 b) Counsel for the defendant desires additional time to review the discovery,
4 counsel with his client, conduct investigation and research related to the
5 criminal charges, and otherwise prepare for trial.

6 c) Counsel for the defendant believes that failure to grant the above-requested
7 continuance would deny him the reasonable time necessary for effective
8 preparation, taking into account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing
11 the case as requested outweigh the interest of the public and the defendant in a
12 trial within the original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18
14 U.S.C. § 3161, et seq., within which trial must commence, the time period of
15 May 2, 2023 to August 1, 2023, inclusive, is deemed excludable pursuant to 18
16 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a
17 continuance granted by the Court at defendant's request on the basis of the
18 Court's finding that the ends of justice served by taking such action outweigh
19 the best interest of the public and the defendant in a speedy trial.

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

23 **IT IS SO STIPULATED.**

24
25 DATED: April 25, 2023

PHILIP A. TALBERT
United States Attorney

27 /s/ KATHERINE T. LYDON

28 KATHERINE T. LYDON
Assistant U.S. Attorney

DATE: April 25, 2023

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Jason Bruce

ORDER

IT IS SO FOUND AND ORDERED.

DATE: April 25, 2023

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE