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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No.: 2:23-cr-00080-JAM
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
vs.	)	<b>AMEND RULE 12 MOTION</b>
PIR DANISH ALI and	)	<b>SCHEDULE</b>
JASON KEITH BRUCE,	)	
Defendants.	)	

**STIPULATION**

The United States of America through its undersigned counsel, Katherine T. Lydon, Assistant United States Attorney and Thomas A. Johnson, counsel for defendant, Jason Keith Bruce, agree to the following:

1. By previous order (*see* Dkt. No. 30), the following Rule 12 motion schedule was set:

Defendant's Dispositive Motions to be filed by: 01/5/2024.

The government's oppositions to be filed by: 2/2/2024.

Replies to be filed by: 02/16/2024.

Hearing on Defendant's Motions: 02/27/2024.

2. Counsel for Defendant is currently in a jury trial and is unable to file motions until that trial concludes and therefore, the parties stipulate to amend the motion schedule as follows:

Defendant's Dispositive Motions to be filed by: **01/26/2024**.

The government's oppositions to be filed by: **03/4/2024**.

Replies to be filed by: **03/11/2024**.

Hearing on Defendant's Motions: **03/26/2024, at 9:00 a.m.**

3. Defense counsel requires time between now and March 26, 2024 to review the discovery, confer with his client, research and prepare Rule 12 motions, and otherwise prepare for trial.
4. It is further stipulated that the period from the date of this stipulation through and including March 26, 2024, should be excluded in computing the time within which trial must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§ 3161(h)(7)(A), and (h)(7)(B)(iv), and Local T4 (reasonable time for preparation of counsel), and the parties request the Court order time excluded until March 26, 2024.
5. The parties agree that this case should go to trial in 2024 and, if the motions are denied, both agree to request a trial date in Fall 2024.

**IT IS SO STIPULATED.**

DATED: January 12, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ KATHERINE T. LYDON

KATHERINE T. LYDON  
Assistant U.S. Attorney

DATE: January 12, 2024

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

**ORDER**

**IT IS SO FOUND AND ORDERED.**

Dated: January 12, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE