

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-00080-JAM  
Plaintiff, } **STIPULATION AND ORDER TO**  
vs. } **AMEND RULE 12 MOTION**  
PIR DANISH ALI and } **SCHEDULE**  
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**.

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

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

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

4 3. Defense counsel requires time between now and March 26, 2024 to review the  
5 discovery, confer with his client, research and prepare Rule 12 motions, and  
6 otherwise prepare for trial.

7 4. It is further stipulated that the period from the date of this stipulation through and  
8 including March 26, 2024, should be excluded in computing the time within which  
9 trial must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§  
10 3161(h)(7)(A), and (h)(7)(B)(iv), and Local T4 (reasonable time for preparation of  
11 counsel), and the parties request the Court order time excluded until March 26,  
12 2024.

13 5. The parties agree that this case should go to trial in 2024 and, if the motions are  
14 denied, both agree to request a trial date in Fall 2024.

15  
16 **IT IS SO STIPULATED.**

17  
18 DATED: January 12, 2024

PHILLIP A. TALBERT  
United States Attorney

20 /s/ KATHERINE T. LYDON

21 KATHERINE T. LYDON  
22 Assistant U.S. Attorney

23 DATE: January 12, 2024

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

## ORDER

## IT IS SO FOUND AND ORDERED.

Dated: January 12, 2024

/s/ John A. Mendez

---

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE