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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:17-cr-00115-TLN-1
11)
Plaintiff,)
12) **STIPULATION AND ORDER TO**
vs.) **CONTINUE STATUS CONFERENCE AND**
13) **EXCLUDE TIME**
PATRICK SLAVIN,)
14)
Defendant.)
15) Date: August 24, 2017
Time: 9:30 a.m.
16) Judge: Hon. Troy L. Nunley

17 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States
18 Attorney, through Todd A. Pickles, Assistant United States Attorney, attorney for Plaintiff, and
19 Heather Williams, Federal Defender, through Assistant Federal Defender Jerome Price, attorney
20 for Patrick Slavin, that the status conference scheduled for August 24, 2017 be vacated and be
21 continued to October 26, 2017 at 9:30 a.m..

22 On July 25, 2017, the government produced its initial round of discovery, which
23 contained 9523 documents. The government supplemented their discovery production on
24 August 21, 2017. The supplemental discovery entails an additional 43 pages of documentary
25 evidence and substantial audio and video evidence. The defense requires time to review the
26 voluminous discovery and to discuss the evidence with the defendant. Additionally, based on the
27 nature of the offense and the alleged scheme, defense counsel may need to consult with experts
28

1 in reviewing discovery. Once discovery review is completed, the defense will have to engage in
2 its own independent fact investigation.

3 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
4 excluded from this order's date through and including October 26, 2017, pursuant to 18 U.S.C.
5 §3161 (h)(7)(A)and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4
6 based upon continuity of counsel and defense preparation.

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Respectfully submitted,

8 HEATHER E. WILLIAMS
9 Federal Defender

10 Date: August 22, 2017

11 /s/ Jerome Price
JEROME PRICE
Assistant Federal Defender
Attorneys for Defendant
PATRICK SLAVIN

13 Date: August 22, 2017

14 PHILLIP A. TALBERT
United States Attorney

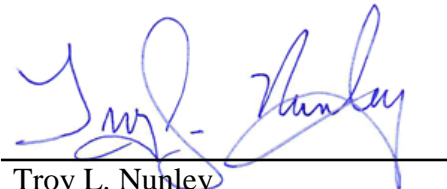
15 /s/ Todd A. Pickles
16 TODD A. PICKLES
Assistant U.S. Attorney
17 Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including October 26, 2017, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). **It is further ordered the August 24, 2017 status conference shall be continued until October 26, 2017, at 9:30 a.m. before Hon. Troy L. Nunley.**

Dated: August 22, 2017


Troy L. Nunley
United States District Judge