

1 MCGREGOR W. SCOTT
United States Attorney
2 JUSTIN L. LEE
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for Plaintiff
United States of America
6
7
8
9

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 REGINALD PAJIMOLA,
15 Defendant.
16

CASE NO. 2:18-CR-00010-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL
ACT; FINDINGS AND ORDER

DATE: January 9, 2020
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

17 **STIPULATION**

- 18 1. By previous order, this matter was set for status on January 9, 2020.
19 2. By this stipulation, the defendant now moves to continue the status
20 conference until January 30, 2020, at 9:30 a.m., and to exclude time between January 9,
21 2020, and January 30, 2020, under Local Code T4.
22 3. The parties agree and stipulate, and request that the Court find the
23 following:
24 a) The government has represented that the discovery associated with
25 this case includes over 14,000 pages and several hours of recorded telephone
26 conversations. All of this discovery has been produced directly to counsel.
27 b) Defense counsel desires additional time to review the discovery,
28 conduct research into the case, to discuss the case with her client, and otherwise

1 prepare for trial in this matter.

2 c) Counsel for defendant believes that failure to grant the above-
3 requested continuance would deny her the reasonable time necessary for effective
4 preparation, taking into account the exercise of due diligence.

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

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

9 f) For the purpose of computing time under the Speedy Trial Act, 18
10 U.S.C. § 3161, et seq., within which trial must commence, the time period of
11 January 9, 2020, to January 30, 2020, inclusive, is deemed excludable pursuant to
12 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a
13 continuance granted by the Court at defendant's request on the basis of the Court's
14 finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

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

IT IS SO STIPULATED.

Dated: January 6, 2020

McGREGOR W. SCOTT
United States Attorney

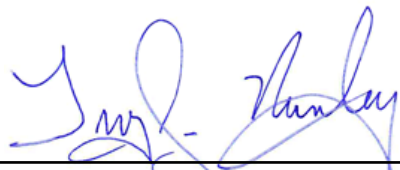
/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: January 6, 2020

/s/ CANDICE FIELDS
CANDICE FIELDS
(as authorized on January 6, 2020)
Counsel for Defendant
Reginald Pajimola

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 7th day of January, 2020.


Troy L. Nunley
United States District Judge