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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSHUA SIMS,
JAMES MASTERSON,
15 EDGAR JIMENEZ, AND
REGINALD PAJIMOLA,
16

Defendants.
17

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

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

DATE: April 11, 2019

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

18
19 **STIPULATION**

20 1. By previous order, this matter was set for status on April 11, 2019.

21 2. By this stipulation, defendants now move to continue the status conference
22 until June 6, 2019, at 9:30 a.m., and to exclude time between April 11, 2019, and June 6,
23 2019, under Local Code T4.

24 3. The parties agree and stipulate, and request that the Court find the
25 following:

26 a) The government has represented that the discovery associated with
27 this case includes over 14,000 pages and several hours of recorded telephone
28 conversations. All of this discovery has been produced directly to counsel.

b) Defense counsel desires additional time to review the discovery, conduct research into the case, to discuss the case with their clients, and otherwise prepare for trial in this matter.

c) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

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

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 11, 2019, to June 6, 2019, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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: April 9, 2019

McGREGOR W. SCOTT
United States Attorney

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

1 Dated: April 9, 2019

/s/ CANDICE FIELDS

CANDICE FIELDS

(as authorized on April 9, 2019)

Counsel for Defendant

Reginald Pajimola

3 Dated: April 9, 2019

/s/ TODD LERAS

TODD LERAS

(as authorized on April 9, 2019)

Counsel for Defendant

Edgar Jimenez

6 Dated: April 9, 2019

/s/ KYLE KNAPP

KYLE KNAPP

(as authorized on April 9, 2019)

Counsel for Defendant

Joshua Sims

8 Dated: April 9, 2019

/s/ DANIEL OLSON

DANIEL OLSON

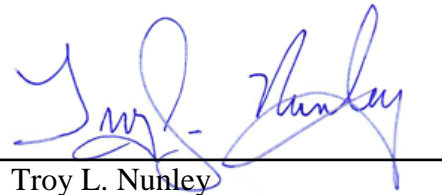
(as authorized on April 9, 2019)

Counsel for Defendant

James Masterson

13 **FINDINGS AND ORDER**

14 IT IS SO FOUND AND ORDERED this 9th day of April, 2019.

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Troy L. Nunley

United States District Judge