

McGREGOR W. SCOTT
United States Attorney
TIMOTHY H. DELGADO
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONTE ROBINS,
ISAIAH BURKS,
RAYSHAWN WRAY, and
JOSHUA MARKANSON,

Defendants.

2:18-CR-00024-GEB

STIPULATION AND [PROPOSED] ORDER TO
CONTINUE STATUS CONFERENCE

Date: March 30, 2018
Time: 10:00 a.m.
Judge: Hon. Garland E. Burrell, Jr.

Plaintiff United States of America, through its undersigned counsel, and Defendants Donte Robins and Joshua Markanson, through their respective counsel, stipulate that the status conference currently set for March 30, 2018, be continued to June 1, 2018, at 9:00 a.m.

On March 5, 2018, Mr. Robins was arraigned on the nine-count Superseding Indictment. (ECF Nos. 15, 21.) Mr. Markanson was arraigned on the Superseding Indictment two days later, on March 7, 2018.¹ (ECF No. 22.) Recently, the government produced to Mr. Robins' defense counsel all discovery relevant to this case. This includes 139 pages of written materials and roughly 130 photos, as well as fifteen compact disks containing dozens of audio and video files. The government expects to deliver

¹ Co-defendants Isaiah Burks and Rayshawn Wray have not been located at this time, and have not appeared for any court proceedings.

these materials to Markanson's defense counsel in the coming week. Both sets of counsel will require time to review these materials, to confer with their clients, to conduct further research and investigation about the charged offenses, and to otherwise prepare for trial.

Based on the foregoing, the parties stipulate that the status conference currently set for March 30, 2018, be continued to June 1, 2018, at 9:00 a.m. The parties further agree that time under the Speedy Trial Act should be excluded from the date this order issues to and including June 1, 2018, under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time to prepare] and General Order 479, Local Code T4, based on continuity of counsel and defense preparation.

Counsel and the defendants also agree that the ends of justice served by the Court granting the requested continuance outweigh the best interests of the public and the defendants in a speedy trial.

Respectfully submitted,

Dated: March 28, 2018

/s/ Timothy H. Delgado
TIMOTHY H. DELGADO
Assistant United States Attorney
Attorneys for Plaintiff United States

Dated: March 28, 2018

/s/ THD for Linda C. Allison
LINDA C. ALLISON
Assistant Federal Defender
Attorney for Defendant Donte Robins

Dated: March 28, 2018

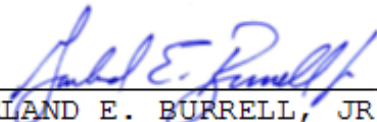
/s/ THD for Etan Zaitso
ETAN ZAITSU
Attorney for Defendant Joshua Markanson

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds that 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 that the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and the Defendants in a speedy trial.

The Court orders that the time from the date the parties stipulated, to and including June 1, 2018, shall be excluded from computation of time within which the trial in 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 that the March 30, 2018 status conference shall be continued until June 1, 2018, at 9:00 a.m.

Dated: March 29, 2018



GARLAND E. BURRELL, JR.
Senior United States District Judge