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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.

CASE NO. 2:18-CR-0024-GEB

STIPULATION AND (PROPOSED) ORDER
TO CONTINUE STATUS CONFERENCE

Date: October 4, 2019
Time: 9:00 a.m.
Judge: Hon. Garland E. Burrell, Jr.

The United States of America, through its undersigned counsel, and defendants Donte Robins, Isaiah Burks, Rayshawn Wray, and Joshua Markanson, through their counsel of record, stipulate that the status conference currently set for October 4, 2019, be continued by two weeks, to October 18, 2019, at 9:00 a.m.

In March 2018, Mr. Robins and Mr. Markanson were arraigned on the nine-count Superseding Indictment. (ECF Nos. 15, 21, 22.) Mr. Burks and Mr. Wray were arraigned separately, in May and November 2018, respectively. (ECF Nos. 37, 64.) The government has produced discovery to defense counsel that includes 139 pages of written materials and roughly 130 photos, as well as fifteen compact disks containing dozens of audio and video files.

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1 In late June 2019, the government made available for physical inspection all of the firearms and
2 magazines purchased as part of this investigation. The parties are now scheduling a time in the coming
3 weeks for defense counsel to inspect the remaining physical evidence collected in this case.

4 Based on the foregoing, defendants Robins, Burks, Wray, and Markanson (through counsel)
5 stipulate that the status conference set for October 4, 2019, be continued by two weeks, to October 18,
6 2019, at 9:00 a.m. The parties further agree that time under the Speedy Trial Act should be excluded
7 from the date the parties stipulated, to and including October 18, 2019, under 18 U.S.C. § 3161(h)(7)(A)
8 and (B)(iv) [reasonable time to prepare], and General Order 479 [Local Code T4], based on continuity of
9 counsel and defense preparation.

10 The parties agree that the failure to grant a continuance in this case would deny defense counsel
11 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
12 The parties also agree that the ends of justice served by the Court granting the requested continuance
13 outweigh the best interests of the public and the defendants in a speedy trial.

14 Respectfully submitted,

15 Dated: October 2, 2019

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

18 Dated: October 2, 2019

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

21 Dated: October 2, 2019

/s/ THD for Philip Cozens
PHILIP COZENS
Attorney for Defendant Isaiah Burks

24 Dated: October 2, 2019

/s/ THD for Todd D. Leras
TODD D. LERAS
Attorney for Defendant Rayshawn Wray

26 Dated: October 2, 2019

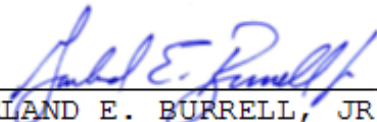
/s/ THD for Etan Zaitso
ETAN ZAITSU
Attorney for Defendant Joshua Markanson

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 also finds that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date the parties stipulated, to and including October 18, 2019, shall be excluded from computation of time within which the trial in this case must begin under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time to prepare], and General Order 479 [Local Code T4]. It is further ordered that the October 4, 2019 status conference be continued until October 18, 2019, at 9:00 a.m.

Dated: October 3, 2019



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