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Attorney for Defendant  
JOSHUA MARKANSON

**IN THE UNITED STATES DISTRICT COURT  
FOR THE 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-00024 GEB

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE STATUS  
CONFERENCE**

DATE: January 11, 2019  
TIME: 9:00 a.m.  
COURT: Hon. Garland E. Burrell, Jr.

Defendants Donte Robins, Isaiah Burks, Rayshawn Wray, and Joshua Markanson, through their counsel of record, and the United States of America, through its undersigned counsel, stipulate that the status conference currently set for January 11, 2019 be continued to April 12, 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 was arraigned in May 2018 (ECF No. 37.), while Mr. Wray was arraigned in November 2018 (ECF. No. 6.) The government originally produced to defense counsel the 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.

1 In mid-November, the government produced additional *Brady v. Maryland*, 373 U.S.  
2 83 (1963), and *Giglio v. United States*, 405 U.S. 150 (1972) discovery regarding a former ATF  
3 agent involved in the present case who is under investigation. Defense counsel will require  
4 time to review these new materials, as well as the materials already produced, time to conduct  
5 research and investigation about the charged offenses and potential defenses, and time to  
6 otherwise prepare for trial.

7 Based on the foregoing, defendants Robins, Burks, Wray and Markanson (through  
8 counsel) stipulate that the status conference currently set for January 11, 2019, be continued to  
9 April 12, 2019, at 9:00 a.m. The parties further agree that time under the Speedy Trial Act  
10 should be excluded from the date the parties stipulated, up to and including April 12, 2019,  
11 under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv)[reasonable time to prepare], and General Order  
12 479 [Local Code T4], based on continuity of counsel and defense preparation.

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

18 Respectfully submitted,

19 Dated: January 9, 2019

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

22 Dated: January 9, 2019

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

25 Dated: January 9, 2019

/s/ Philip Cozens  
Philip Cozens  
Attorney for Defendant Isaiah Burks

27 Dated: January 9, 2019

/s/ Etan Zaitsu  
ETAN ZAITSU  
Attorney for Defendant Joshua Markanson

1 Dated: January 9, 2019

/s/ Todd Leras

TODD LERAS

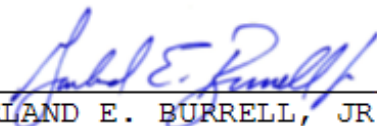
Attorney for Defendant Rayshawn Wray

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6 [PROPOSED] ORDER

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8 The Court, having received and considered the parties' stipulation, and good cause  
9 appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court  
10 specifically finds that the failure to grant a continuance in this case would deny counsel  
11 reasonable time necessary for effective preparation, taking into account the exercise of due  
12 diligence. The Court also finds that the ends of justice served by granting the requested  
13 continuance outweigh the best interests of the public and the defendant in a speedy trial.

14 The Court orders that the time from the date the parties stipulated, up to and including  
15 April 12, 2019, shall be excluded from computation of time within which the trial in this case  
16 must begin under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable  
17 time to prepare], and General Order 479 [Local Code T4]. It is further ordered that the January  
18 11, 2019 status conference be continued until April 12, 2019, at 9:00 a.m.

19 Dated: January 10, 2019

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