

1 **JENNIFER C. NOBLE, ESQ., CSBN 256952**
2 **WISEMAN LAW GROUP, P.C.**
3 **1477 Drew Avenue, Suite 106**
4 **Davis, California 95618**
5 **Telephone: 530.759.0700**
6 **Facsimile: 530.759.0800**

7 **Attorney for Defendant**
8 **SHARON KING**

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11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE EASTERN DISTRICT OF CALIFORNIA**
13 **SACRAMENTO DIVISION**

14 UNITED STATES OF AMERICA,) Case No. CR S 13-CR-00309 JAM
15 Plaintiff,)
16 vs.) **STIPULATION AND ORDER TO**
17) **CONTINUE STATUS**
18 KEON NUNNELLY, SHARON KING, and)
19 KIA MOORE,)
20 Defendants.)

21 **IT IS HEREBY stipulated between the United States of America through**
22 **its undersigned counsel, Kyle Reardon, Assistant United States Attorney; Michael**
23 **Chastaine, attorney for Keon Nunnelly; Candace Fry, attorney for Kia Moore; and**
24 **Jennifer C. Noble, attorney for defendant Sharon King, that the status conference**
25 **presently set for October 22, 2013, be continued to November 19, 2013, at 9:45 a.m.,**
26 **thus vacating the presently set status conference.**

27 **The parties need additional time to continue to distribute and review case**
28 **discovery. Therefore, counsel for the parties stipulate and agree that the interests of**
justice served by granting this continuance outweigh the best interests of the defendants
and the public in a speedy trial. 18 U.S.C. 3161(h)(7)(A) (continuity of counsel/
reasonable time for effective preparation) and Local Code T4, and agree to exclude time

1 from the date of the filing of the order until the date of the status conference, November
2 19, 2013.

3 **IT IS SO STIPULATED.**

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5 Dated: October 17, 2013

By: /s/ Jennifer C. Noble
JENNIFER C. NOBLE
WISEMAN LAW GROUP
Attorney for Defendant
SHARON KING

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8 Dated: October 17, 2013

By: /s/ Candace A. Fry
CANDACE A. FRY
Attorney for Defendant
KIA MOORE

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11 Dated: October 17, 2013

By: /s/ Michael Chastaine
MICHAEL CHASTAINE
Attorney for
KEON NUNNELLY

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14 Dated: October 17, 2013

Benjamin B. Wagner
United States Attorney

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16 By: /s/ Kyle Reardon
KYLE REARDON
Assistant U.S. Attorney

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22 **ORDER**

23 The Court, having received, read, and considered the stipulation of the parties,
24 and good cause appearing therefrom, adopts the stipulation of the parties in its entirety
25 as its order. Based on the stipulation of the parties and the recitation of facts contained
26 therein, the Court finds that it is unreasonable to expect adequate preparation for
27 pretrial proceedings and trial itself within the time limits established in 18 U.S.C. § 3161.
28 In addition, the Court specifically finds that the failure to grant a continuance in this

1 case would deny defense counsel to this stipulation reasonable time necessary for
2 effective preparation, taking into account the exercise of due diligence. The Court finds
3 that the ends of justice to be served by granting the requested continuance outweigh the
4 best interests of the public and the defendants in a speedy trial.

5 The Court orders that the time from the date of the parties' stipulation, October
6 17, 2013, to and including November 19, 2013, shall be excluded from computation of
7 time within which the trial of this case must be commenced under the Speedy Trial Act,
8 pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(ii) and (iv), and Local Codes T4
9 (reasonable time for defense counsel to prepare). It is further ordered that the October
10 24, 2013, status conference shall be continued until November 19, 2013, at 9:45 a.m

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12 **IT IS SO ORDERED.**

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14 Dated: 10/18/2013

15 /s/ John A. Mendez
16 JOHN A. MENDEZ, JR
17 United States District Court Judge
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