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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF COLUMBIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 DANIEL SHAW,
16 Defendant.

Case No.: CR 22-00001 EGS

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

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18 The above captioned matter is currently set for a status conference on June 8, 2022. Defense
19 counsel and Mr. Shaw require additional time to review the discovery specifically for Mr. Shaw in
20 addition to the voluminous video, radio, and other global discovery. Therefore, the parties agree that
21 the matter be continued to a day favorable to the Court the week of July 25, 2022.

22 The parties further stipulate and request that, under the Speedy Trial Act, the Court exclude
23 and toll the time from June 8, 2022 to the next status conference. An exclusion is appropriate under
24 18 U.S.C. § 3161(h)(7)(B)(iv), effective preparation of counsel, taking into account the exercise of
25 due diligence. An exclusion of time from June 8, 2022 to the next status conference, is also
26 appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), as the ends of justice served the granting of such
27 continuance outweigh the best interest of the public and the defendant in a speedy trial.
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Dated: May 25, 2022

Respectfully submitted,

JODI LINKER
Federal Public Defender
Northern District of California

/S

ELISSE LAROUCHE
Assistant Federal Public Defender

May 25, 2022

MATTHEW M. GRAVES
United States Attorney
District of Columbia

/S

MARIA FEDOR
Attorney, detailed to the U.S.
Attorney's Office for the District of
Columbia

[PROPOSED] ORDER

On the motion of counsel, it is HEREBY ORDERED that the status conference presently set for June 8, 2022 is continued to _____ at _____.

IT IS FURTHER ORDERED that the period from June 8, 2022 through _____, shall be excluded from calculation under the Speedy Trial Act, 18 U.S.C. §3161 et. seq. because for the reasons stated in defendant's motion, the Court finds that it is unreasonable to expect adequate preparation for pretrial proceedings and trial within the time limits of the Act and that the extension is reasonably necessary for the defendant and counsel to prepare effectively, and the ends of justice served by the continuance outweigh the interest of the public and Defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(B)(iv).

Dated: _____

EMMETT G. SULLIVAN
United States District Judge