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 Federal Defender
 2 BENJAMIN D. GALLOWAY, #214897
 Assistant Federal Defender
 3 Designated Counsel for Service
 801 "I" Street, 3rd Floor
 4 Sacramento, CA 95814
 5 Attorney for Defendant
 AWS MOHAMMED YOUNIS AL-JAYAB
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 8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,)	Case No. 2:16-cr-008 MCE
)	
12 Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	TO CONTINUE STATUS CONFERENCE
13 v.)	
)	
14 AWS MOHAMMED YOUNIS AL-JAYAB,)	DATE: March 17, 2016
)	TIME: 9:00 a.m.
15 Defendant.)	JUDGE: Hon. Morrison C. England, Jr.
)	

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 17 It is hereby stipulated and agreed to between the United States of America through JILL
 18 THOMAS, Assistant U.S. Attorney and defendant AWS MOHAMMED YOUNIS AL-JAYAB
 19 by and through his counsel, BENJAMIN GALLOWAY, Assistant Federal Defender, that the
 20 status conference set for March 17, 2016 be continued to May 12, 2016 at 9:00 a.m.

21 To date, the government has provided close to 300,000 pages of discovery with more
 22 forthcoming. The discovery provided also includes grand jury subpoenas and many hours of
 23 recordings. The grounds for this continuance are that defense counsel require additional time to
 24 review the voluminous discovery that has been and will be produced, and to investigate the facts
 25 of the case.

26 The parties stipulate that the ends of justice are served by the Court excluding such time,
 27 so that counsel for the defendant may have reasonable time necessary for effective preparation,
 28

1 taking into account the exercise of due diligence pursuant to 18 U.S.C. §3161(h)(7)(A) and
2 (B)(iv) [reasonable time for counsel to prepare] (Local Code T-4); and for complexity under 18
3 U.S.C. § 3161(h)(8)(B)(ii) and (Local Code T-2).

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DATED: March 15, 2016

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

/s/ Benjamin Galloway
BENJAMIN GALLOWAY
Assistant Federal Defender
Attorney for Defendant
AWS MOHAMMED YOUNIS AL-JAYAB

DATED: March 15, 2016

BENJAMIN B. WAGNER
United States Attorney

/s/ Jill Thomas
JILL THOMAS
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

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2 The Court, having received, read, and considered the stipulation of the parties, and good
3 cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. The
4 Court specifically finds that the failure to grant a continuance in this case would deny counsel
5 reasonable time necessary for effective preparation, taking into account the exercise of due
6 diligence. The Court finds that the ends of justice to be served by granting the requested
7 continuance outweigh the best interests of the public and defendant in a speedy trial.

8 The Court orders that the time from the date of the parties stipulation, up to and including
9 May 12, 2016, shall be excluded from computation of time within which the trial of this case
10 must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. §3161(h)(7)(A) and
11 (B)(iv) [reasonable time for counsel to prepare] (Local Code T-4); and for complexity under 18
12 U.S.C. § 3161(h)(8)(B)(ii) and (Local Code T-2). It is further ordered that the March 17, 2016
13 status conference shall be continued until May 12, 2016, at 9:00 a.m.

14 DATED: March _____, 2016

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16 HON. MORRISON C. ENGLAND, JR.
17 United States District Court Judge
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