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10 Attorneys for Defendant
BRADLEY EARL REGER

11 IN THE UNITED STATES DISTRICT COURT FOR THE
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,) No. 2:23-cr-0177 TLN
15 Plaintiff,)
16 v.) STIPULATION REGARDING
17 BRADLEY EARL REGER,) EXCLUDABLE TIME PERIODS UNDER
18 Defendant.) SPEEDY TRIAL ACT; [PROPOSED]
19) FINDINGS AND ORDER
20)

21 **STIPULATION**

22 Plaintiff United States of America, by and through its counsel of record Assistant United
23 States Attorneys CHRISTINA McCALL and ROGER YANG, and the Defendant, BRADLEY
24 EARL REGER, by and through his counsel of record TASHA PARIS CHALFANT and KRESTA
25 NORA DALY, hereby stipulate and request that the Court make the following findings and Order
26 as follows:
27

28 STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONFERENCE
AND FOR EXCLUSION OF TIME

1 1. By previous order, this matter was set for a status conference before Judge Troy L.
2 Nunley on September 28, 2023, with time excluded to that date.

3 2. By this stipulation, the defendant now moves to continue the status conference until
4 January 18, 2024, and to exclude time between September 28, 2023, and January 18, 2024, under
5 Local Code T4. Plaintiff does not oppose this request.

6 3. The parties agree and stipulate, and request that the Court find the following:

7 a. The government has represented that the discovery associated with this case will
8 be voluminous and provided over periodic productions. To date, we have received approximately
9 2,200 pages and another 5,000 pages are forthcoming. These include investigative reports in
10 electronic form, as well as audio/video and native files.
11

12 b. Counsel for the defendant desires additional time to review the voluminous
13 discovery, develop the case, conduct investigation, consult with their client, discuss potential
14 resolution, and to explain the consequences and guidelines.
15

16 c. Counsel for the defendant believes that failure to grant the above-requested
17 continuance would deny them the reasonable time necessary for effective preparation, taking into
18 account the exercise of due diligence.
19

20 d. The government does not object to the continuance.

21 e. Based on the above-stated findings, the ends of justice served by continuing the
22 case as requested outweigh the interest of the public and the defendant in a trial within the original
23 date prescribed by the Speedy Trial Act.
24

25 f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
26 et seq., within which trial must commence, the time period of September 28, 2023, to January 28,
27

28 STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONFERENCE

 AND FOR EXCLUSION OF TIME

1 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
2 T4] because it results from a continuance granted by the Court at defendant's request on the basis
3 of the Court's finding that the ends of justice served by taking such action outweigh the best interest
4 of the public and the defendant in a speedy trial.

5 4. Nothing in this stipulation and order shall preclude a finding that other
6 provisions of the Speedy Trial Act dictate that additional time periods are excludable from the
7 period within which a trial must commence.
8

9 All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on
10 their behalf.

11 IT IS SO STIPULATED.

12
13 Dated: September 21, 2023 by: /s/Tasha Chalfant for
14 CHRISTINA McCALL
15 Assistant U.S. Attorney
16 Attorney for Plaintiff

17 Dated: September 21, 2023 by: /s/Tasha Chalfant for
18 ROGER YANG
19 Assistant U.S. Attorney
20 Attorney for Plaintiff

21 Dated: September 21, 2023 by: /s/Tasha Chalfant
22 TASHA CHALFANT
23 Attorney for Defendant
24 BRADLEY EARL REGER

25 Dated: September 21, 2023 by: /s/Tasha Chalfant for
26 KRESTA NORA DALY
27 Attorney for Defendant
28 BRADLEY EARL REGER

STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONFERENCE
AND FOR EXCLUSION OF TIME

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be 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 of the parties' stipulation, September 28, 2023, to and including January 18, 2024, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the presently set September 28, 2023, status conference shall be continued to January 18, 2024, at 9:00 a.m.

IT IS SO FOUND AND ORDERED this ____ day of _____, 2023.

HON. TROY L. NUNLEY
UNITED STATES DISTRICT COURT JUDGE

STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONFERENCE
AND FOR EXCLUSION OF TIME