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6 Attorney for Defendant
7 GAL YIFRACH

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 GAL YIFRACH, et al.,
15 Defendants.

CASE NO. 2:22-CR-00046 WBS
STIPULATION CONTINUING STATUS
CONFERENCE TO SEPTEMBER 9, 2024, AT 9:00
A.M. AND FOR EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT AND ORDER

16
17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendants, by and
19 through their counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for a status conference before this Court on
21 June 24, 2024.
- 22 2. By this stipulation, the defendants now move to continue this status conference and set a
23 status conference for September 9, 2024, and to exclude time between June 24, 2024, and September 9,
24 2024 under Local Code T4.
- 25 3. The parties agree and stipulate, and request that the Court find the following:
- 26 a) The government has produced 142,689 pages of numbered discovery to
27 defendants, which includes copies of documents and recordings; and, the government has
28 provided additional materials for production in discovery consisting of a number of electronic

1 devices seized including phones, laptops and various external storage devices, as well as email
2 accounts.

3 b) Counsel for each defendant desires additional time to familiarize themselves with
4 the case and review the voluminous discovery, discuss the case with their respective clients and
5 the attorney for the United States, and otherwise prepare for trial, which includes consulting with
6 one or more forensic experts, including a forensic accountant.

7 c) Counsel for the defendants believes that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence; and, their respective litigation commitments.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendants in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of June 24, 2024, to September 9,
16 2024, at 9:00 a.m., inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)
17 [Local Code T4] because it results from a continuance granted by the Court at the defendants'
18 request on the basis of the Court's finding that the ends of justice served by taking such action
19 outweigh the best interest of the public and the defendants in a speedy trial.

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

23 IT IS SO STIPULATED.

24 Dated: June 10, 2024

PHILLIP A. TALBERT
United States Attorney

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26 /s/ ROGER YANG
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ROGER YANG
Assistant United States Attorney

IT IS SO STIPULATED BY ALL DEFENDANTS.

Dated: June 10, 2024

/s/ DAVID W. DRATMAN
DAVID W. DRATMAN
Counsel for Defendant GAL YIFRACH

Dated: June 10, 2024

/s/ MALCOLM S. SEGAL
MALCOLM S. SEGAL
Counsel for Defendant
SCHNEUR ZALMAN GETZEL ROSENFELD

Dated: June 10, 2024

/s/ DAVID E. KENNER
DAVID E. KENNER
Counsel for Defendant
SHALOM IFRACH


Dated: June 10, 2024

/s/ VICTOR SHERMAN
VICTOR SHERMAN
Counsel for Defendant
NICK SHKOLNIK

ORDER

The request to continue the June 24, 2024 status conference is **DENIED**. At that conference, counsel shall be prepared to discuss whether the case as against defendant Rosenfeld will go forward on the Superseding Information filed March 19, 2024, or a second superseding information as discussed at the hearing on April 1, 2024, or on the original Indictment.

Dated: June 11, 2024



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE