

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

No. 17-20775

v.

HON. ROBERT H. CLELAND

D-1 DINO BUCCI,

Defendant.

**STIPULATION AND ORDER TO CONTINUE
FINAL PRETRIAL CONFERENCE AND TRIAL AND
FINDING EXCLUDABLE DELAY**

The parties stipulate to continue the final pretrial conference from June 27, 2019, until January 7, 2020, and the trial from July 15, 2019, until January 21, 2020 at 9:00 A.M.

The parties further stipulate, and jointly move for the Court to find, that the time period between July 16, 2019, and January 21, 2020, qualifies as excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the Defendant in a speedy trial. The parties' reasons for the continuance and for a finding of excludable delay are as follows:

- The defendant has decided to cooperate with the government, which the parties believe will eventually lead to a resolution of the case with a plea to one or more offenses.
- Given the vast scope of the corruption case under investigation, about which the defendant has knowledge, including approximately 100 hours of tape recordings, substantial additional time is needed for the parties to meet and conduct debriefings.
- Following the debriefings, the government needs more time to follow-up on information provided by the defendant, including obtaining documents and interviewing scores of witnesses.

The parties therefore request that the Court find that the ends of justice served by the granting of this continuance outweigh the best interests of the public and the Defendant in a speedy trial. *See United States v. Watson*, 766 F.3d 1219, 1230-34 (10th Cir. 2014) (ends-of-justice continuance justified where government needed additional time to conduct further debriefings of co-defendant, interview witnesses and obtain documents).

IT IS SO STIPULATED:

For the United States of America:

For the Defendant:

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s/Steven P. Cares

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Dated: June 27, 2019

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HON. ROBERT H. CLELAND

D-1 DINO BUCCI,

Defendant.

**ORDER CONTINUING FINAL PRETRIAL CONFERENCE AND
TRIAL AND FINDING EXCLUDABLE DELAY**

The Court has considered the parties' stipulation and joint motion to continue the final pretrial conference and the trial and for a finding that the time period from July 16, 2019, to January 21, 2020, qualifies as excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7). For the reasons described in the parties' submission, and after considering the factors listed in § 3161(h)(7)(B), the Court finds, based upon the facts as found below, that the ends of justice served by granting the parties' requested continuance outweigh the best interests of the public and the Defendant in a speedy trial, and that the time from July 16, 2019, to January 21, 2020, qualifies as excludable delay under § 3161(h)(7). Specifically, accepting the facts as stipulated by the parties, the Court finds that:

- The defendant has decided to cooperate with the government, which the parties believe will eventually lead to a resolution of the case with a plea to one or more offenses.
- Given the vast scope of the corruption case under investigation, about which the defendant has knowledge, including approximately 100 hours of tape recordings, substantial time is needed for the parties to meet and conduct debriefings.
- In addition to the debriefings, the government needs more time to follow-up on information provided by the defendant, including obtaining documents and interviewing scores of witnesses.

IT IS THEREFORE ORDERED that the time from July 16, 2019, to January 21, 2020, shall constitute excludable delay under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the Court finds that the ends of justice served by the granting of the continuance outweigh the best interests of the public and the Defendant in a speedy trial.

IT IS FURTHER ORDERED that the trial in this case will be continued and that the following deadlines will apply to these proceedings:

Pretrial Motions Deadline: November 7, 2019

Final Pretrial Conference: January 7, 2020 at 1:30 pm

Trial: January 21, 2020 at 9:00 am

s/Robert H. Cleland
Robert H. Cleland
United States District Judge

Entered: June 27, 2019