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Attorney for Shannon Egeland

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHANNON EGELAND,

Defendant.

Case No. 6:09-CR-60167-2-AA

DECLARATION OF COUNSEL
IN SUPPORT OF DEFENDANT
SHANNON EGELAND'S
**EMERGENCY MOTION TO
POSTPONE SURRENDER DATE**

I, Todd H. Grover, declare the following to be true to the best of my information and belief:

1. I represent Defendant Shannon Egeland in the above captioned matter. I make this declaration in support of Mr. Egeland's emergency motion to postpone his self-surrender date.

2. On January 29, 2014, the Honorable Ann Aiken, United States Chief District Court Judge, sentenced Mr. Egeland to 120 months imprisonment in this case. Judge Aiken initially ordered that Mr. Egeland surrender to authorities to begin service of that sentence on May 1, 2014, but later postponed Mr. Egeland's self-surrender date until August 1, 2014, so that he could help care for his wife's serious medical needs.

3. By the accompanying motion, Mr. Egeland requests that the surrender date be postponed for a period of two weeks, to August 15, 2014. I received a telephone call this morning from U.S. Probation Officer Mandy Arnold, who is supervising Mr. Egeland during this period of post-sentencing release. Ms. Arnold informed me that she has been in contact with law enforcement officials in Idaho, who confirmed that Mr. Egeland was shot early this morning when he reportedly stopped to help a motorist. According to Ms. Arnold, Mr. Egeland suffered a shotgun wound to the lower extremities and is currently hospitalized. I also spoke this morning with Mr. Egeland's mother, Linda Thomas. Ms. Thomas told me that she has spoken with an Idaho detective involved in the shooting investigation. According to Ms. Thomas, Mr. Egeland suffered multiple fractures in his legs and substantial blood loss. He underwent surgery this morning and is currently in stable condition in an intensive care unit. I have not yet been able to speak with Mr. Egeland. I have, however, spoken with a Detective Garrison in Idaho, who confirmed the information provided by Ms. Thomas.

4. I have been able to locate a number of short articles on the internet concerning the shooting by searching for "Caldwell motorist shot." One such article can be found at: <http://www.idahostatesman.com/2014/07/31/3304087/man-with-gunshot-wound-north-of.html?sp=/99/101/102/>.

5. I have shared what information I currently have with Assistant U.S. Attorney Scott Bradford and U.S. Pretrial Services Officer Nick Stranieri.

6. Based on the available information, it seems certain that Mr. Egeland will be physically unable to self-surrender tomorrow as scheduled. At this point, the full extent and nature of Mr. Egeland's injuries are unknown. Likewise, I do not have a

prognosis for his recovery, or know how long that recovery will take. Given what information I do have, however, I anticipate that he will need a substantial amount of time to recover from his injuries. The requested, two-week extension will allow the parties time to obtain more information for the Court concerning Mr. Egeland's injuries and likely recovery needs.

7. The Government is represented in this matter by Assistant U.S. Attorney Scott Bradford. I sent Mr. Bradford an e-mail this morning outlining the situation and suggesting that a 30-60 day extension of the surrender deadline would be appropriate. Mr. Bradford later called my office to discuss the matter, but I was unavailable at the time, and did not have an opportunity to speak with him. Mr. Bradford did, however, leave a voice message to the effect that a one-or-two week extension of the deadline would be more appropriate at this point in time. Mr. Bradford also indicated that he is out of the office, and that the best way to reach him is via e-mail. I subsequently sent Mr. Bradford an e-mail soliciting his position on a two-week extension, but have not had a response. I do not object to Mr. Bradford contacting the Court directly with his position on the requested, two-week extension.

8. I swear under penalty of perjury that the foregoing is true to the best of my information and belief.

DATED this 31st day of July, 2014.

s/ Todd H. Grover

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF COUNSEL IN SUPPORT OF DEFENDANT SHANNON EGELAND'S **EMERGENCY** MOTION TO POSTPONE SURRENDER DATE on:

Scott Bradford
Assistant U.S. Attorney
United States Attorney's Office
405 E. 8th Avenue, Suite 2400
Eugene, Oregon 97401

Attorney for the Plaintiff

by electronic case filing.

DATED this 31st day of July, 2014.

s/ Todd H. Grover

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