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ATTORNEY FOR Defendant,
JULIE DIANNE FARMER

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA, Plaintiff, v. JULIE DIANNE FARMER, Defendant.	Case No.: 1:11-CR-00026-LJO **REQUEST FOR AN EXTENSION OF TIME IN WHICH TO FILE MOTION FOR JUDGMENT OF ACQUITTAL AND NEW TRIAL PURSUANT TO FEDERAL RULES OF CRIMINAL PROCEDURE RULE 29(c) AND 33(a)**

TO: THE HONORABLE JUDGE LAWRENCE J. O'NEILL, AND TO UNITED STATES ATTORNEY BENJAMIN WAGNER AND HIS REPRESENTATIVES, ASSISTANT UNITED STATES ATTORNEY'S KIRK E. SHERRIFF, HENRY Z. CARBAJAL, III, AND CHRISTOPHER BAKER:

Defendant, JULIE DIANNE FARMER, requests that she be granted an Extension of Time in which to file Motion for Judgment of Acquittal and Motion for New Trial, pursuant to Fed. Rules of Crim. Proc., Rule 29(c) and 33(a).

Said request is based on the following Declaration of Anthony P. Capozzi.

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AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

DECLARATION OF ANTHONY P. CAPOZZI

I, Anthony P. Capozzi, declare that I am an attorney licensed to practice law in the State of California and in good standing. I am counsel of record for Defendant, Julie Dianne Farmer. I have personal knowledge of the facts stated below and could testify competently to them if required.

1. This attorney has represented Defendant, Julie Dianne Farmer from the inception of this case throughout the jury trial.

2. On April 22, 2014, the jury returned verdicts of guilty on five (5) counts of the Indictment.

3. Both the Defense and the Government have ordered trial transcripts from the court reporters.

4. It is this attorney's understanding that the court reporter needs approximately 30 days in which to prepare the trial transcripts.

5. This attorney has conferred with Assistant United States Attorneys Kirk Sherriff and Christopher Baker regarding this request. The Government does not have an objection to a reasonable extension of time in which to file said motions.

6. The parties have agreed, subject to the concurrence of the court, that the Defendant be given an extension until June 13, 2014, to file its motions. The Government shall respond by July 2, 2014, and the Defendant shall reply by July 9, 2014. The motions shall be heard on July 14, 2014, at 10:00 a.m.

Respectfully submitted,

DATED: April 25, 2014

By: */s/Anthony P. Capozzi*
ANTHONY P. CAPOZZI
Attorney for Defendant JULIE DIANNE FARMER

ORDER

Request Granted for good cause.

IT IS SO ORDERED.

Dated: **April 28, 2014**

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE