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ATTORNEY FOR Defendant,
JULIE DIANNE FARMER

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

* * * * * *

UNITED STATES OF AMERICA, Plaintiff, v. JULIE DIANNE FARMER, Defendant.	Case No.: 1:11-CR-00026-LJO ***AMENDED* STIPULATION FOR EXTENSION OF TIME IN WHICH TO FILE FORMAL OBJECTIONS, SENTENCING MEMORANDUMS, AND GOVERNMENT'S RESPONSE TO MOTION FOR NEW TRIAL**

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:

Plaintiff, United States of America, by and through its counsel of record, and Defendant, by and through her counsel of record, hereby stipulate as follows:

1. By previous order, this matter is set for sentencing on September 29, 2014, at 10:30 a.m.

2. The date to file Formal Objections and the Government's Response to Defendant's Motion for New Trial (Brady Motion) is September 16, 2014.

3. The defense requests an extension of time to September 22, 2014, to file Formal Objections and Sentencing Memorandums.

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AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

4. The basis for said request is that:

a. On September 15, 2014, the defense received 1154 pages of additional pages of discovery related to the loss issue from JP Morgan Chase and Wells Fargo.

b. On September 9, 2014, the defense received 969 pages of discovery in addition to numerous excel spreadsheets regarding 437 properties in addition to a number of other spreadsheets. A number of non-Bates Stamped PDF files were included along with this discovery.

c. The defense has not had the opportunity to review this discovery with the Defendant nor to analyze any of this discovery.

d. This additional discovery is directly related to the issue of loss which is a factor in determining the Defendant's sentence.

e. Without an analysis of this discovery the defense cannot adequately prepare for sentencing.

5. The government does not object to this extension of time.

6. The parties stipulate and agree that the date for both Government and Defense to file Formal Objections and Sentencing Memorandums be extended to September 22, 2014.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: September 16, 2014 By: */s/Anthony P. Capozzi*
ANTHONY P. CAPOZZI
Attorney for Defendant JULIE DIANNE FARMER

DATED: September 16, 2014 By: */s/John P. Balazs*
JOHN P. BALAZS
Attorney for Defendant JULIE DIANNE FARMER

DATED: September 16, 2014 By: */s/Kirk E. Sherriff*
KIRK E. SHERRIFF
HENRY Z. CARBAJAL, III
CHRISTOPHER D. BAKER
Assistant United States Attorneys

ORDER

The date to file Formal Objections and Sentencing Memorandums is hereby extended to September 22, 2014.

The amended stipulation does not address good cause for the extension of the Government's opposition to the motion for new trial, nor does this current order extend that deadline.

IT IS SO ORDERED.

Dated: **September 16, 2014** **/s/ Lawrence J. O'Neill**
UNITED STATES DISTRICT JUDGE