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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 **STIPULATION AND ORDER FOR CONTINUANCE OF SENTENCING** **Date: September 22, 2014** **Time: 10:30 a.m.** **Hon. Lawrence J. O'Neill**

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 was set for sentencing on September 22, 2014, at 10:30 a.m.

2. On August 29, 2014, Attorney John Balazs joined the defense in representing Ms. Farmer. On September 4, 2014, a Motion for New Trial (Brady Motion) was filed by Mr. Balazs. Additionally, Mr. Balazs is unavailable to appear on September 22, 2014, at 10:30 a.m.

3. Between July 15, 2014, and September 2, 2014, the defense has received approximately 3,419 additional pages of discovery related to the $28,000,000 loss issue.

4. Additional time is needed to prepare an analysis of the new and pending discovery, for the Probation Office and the Court, regarding actual losses. Additional time is needed for the Government to respond to the new Motion for New Trial (Brady Motion), and for Mr.

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Balazs to appear for Defendant at the Sentencing Hearing.

5. Accordingly, the parties stipulate that the sentencing hearing set for September 22, 2014, be continued to September 29, 2014, at 10:30 a.m. and that the date to file Formal Objections be continued to September 16, 2014, and the Government's Response to Defendant's new Motion for New Trial is due on September 16, 2014.

6. No further continuances are anticipated.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: September 5, 2014 By: */s/Anthony P. Capozzi*
ANTHONY P. CAPOZZI
Attorney for Defendant JULIE DIANNE FARMER

DATED: September 5, 2014 By: */s/John P. Balazs*
JOHN P. BALAZS
Attorney for Defendant JULIE DIANNE FARMER

DATED: September 5, 2014 By: */s/Kirk E. Sherriff*
KIRK E. SHERRIFF
HENRY Z. CARBAJAL, III
CHRISTOPHER D. BAKER
Assistant United States Attorneys

ORDER

For reasons set forth above, the continuance requested by the parties is granted.

IT IS ORDERED that the Sentencing currently scheduled for September 22, 2014, at 10:30 a.m. is continued to **September 29, 2014, at 10:30 a.m.** and the Formal Objections and the Government's response to the Motion for New Trial be filed on September 16, 2014.

IT IS SO ORDERED.

Dated: **September 9, 2014** **/s/ Sheila K. Oberto**
UNITED STATES MAGISTRATE JUDGE