

PHILLIP A. TALBERT  
United States Attorney  
JESSICA A. MASSEY  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MAURILIO SERRANO CARDENAS,  
  
Defendant.

CASE NO. 1:18-CR-00068-ADA-BAM

STIPULATION TO CONTINUE CHANGE OF  
PLEA HEARING AND EXCLUDE TIME UNDER  
SPEEDY TRIAL ACT; ORDER

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through his counsel of record, hereby stipulate as follows.

1. This case was previously set for change of plea on March 6, 2023.
2. The parties have been in ongoing discussions re: defendant's upcoming change of plea hearing and are in need of additional time to finalize certain details.
3. By this stipulation, the parties now move to continue the change of plea hearing to March 27, 2023.
4. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case has been either produced directly to counsel and/or made available for inspection and copying. The government is aware of its ongoing discovery obligations.
  - b) Counsel for defendant desires additional time to review discovery, discuss with

his client the proposed resolution in this case, and prepare his client for a change of plea hearing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

5. The parties are in agreement that time shall be excluded from March 6, 2023, through the new change of plea hearing date on March 27, 2023, pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4], because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

6. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Act Trial dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 2, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ JESSICA A. MASSEY  
JESSICA A. MASSEY  
Assistant United States Attorney


Dated: March 2, 2023

/s/ RICHARD MEHDI OBERTO  
RICHARD MEHDI OBERTO  
Counsel for Defendant  
MAURILIO SERRANO CARDENAS

**ORDER**

IT IS SO ORDERED.

Dated: March 2, 2023

  
UNITED STATES DISTRICT JUDGE