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6 Attorneys for Defendant
RAMON MAGANA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 RAMON MAGANA,

15 Defendant.
16

Case No. 1:18-cr-00068-DAD-BAM

**STIPULATION TO MODIFY BRIEFING
SCHEDULE AND HEARING DATE;
ORDER**

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Jessica Massey, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Ramon Magana, that the briefing schedule
20 previously set on March 22, 2022 (*see* Dkt. #50), be modified as set forth below, and that the
21 motion hearing currently set for Monday, June 6, 2022, be continued to Monday, June 27, 2022.

22 On March 21, 2022, the parties submitted a stipulation to set a briefing schedule and
23 hearing date on a proposed defense motion to suppress. *See* Dkt. #49. Since that date, the parties
24 have been in discussions regarding additional discovery, which was provided on April 7, 2022,
25 and April 13, 2022. In light of this discovery and a defense request to continue the briefing
26 schedule and hearing date, the parties hereby agree and stipulate that the briefing schedule and
27 hearing date previously set be modified in accordance with the below:
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- Defense motion to be filed on or before May 13, 2022
- Government opposition to be filed on or before June 3, 2022
- Any defense reply to be filed on or before June 17, 2022
- Motion hearing to be set on June 27, 2022, at 9:00 a.m.

The dates proposed are mutually agreeable dates for the parties and the parties make this request with the intention of conserving time and resources for both the parties and the Court.

The parties agree that the delay resulting from the continuance to June 6, 2022, shall be excluded under 18 U.S.C. § 3161(h)(1)(D) because the delay results from the filing of a pretrial motion, through the conclusion of any hearing on the motion, and the prompt disposition of the motion. *See* 18 U.S.C. § 3161(h)(1)(D).

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: April 15, 2022

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
RAMON MAGANA

PHILLIP A. TALBERT
United States Attorney

Date: April 15, 2022

/s/ Jessica Massey
JESSICA MASSEY
Assistant United States Attorney
Attorney for Plaintiff

ORDER

IT IS SO ORDERED. The briefing schedule on the defense motion is hereby modified in accordance with the above. The defense motion is to be filed on or before May 13, 2022. The government opposition is to be filed on or before June 3, 2022. Any defense reply is to be filed on or before June 17, 2022. A hearing on the motion is hereby set for June 27, 2022, at 9:00 a.m. before the Honorable Dale A. Drozd, United States District Court Judge.

Time shall be excluded to June 27, 2022, under 18 U.S.C. § 3161(h)(1)(D) because the delay results from the filing of a pretrial motion, through the conclusion of any hearing on the motion, and the prompt disposition of the motion.

IT IS SO ORDERED.

Dated: **April 18, 2022**


UNITED STATES DISTRICT JUDGE