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

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; 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 change of plea hearing
20 currently scheduled for April 24, 2023, at 8:30 a.m. be continued to May 22, 2023, at 8:30 a.m.

21 On March 7, 2023, this matter was set for a change of plea hearing on April 24, 2023. *See*
22 Dkt. #77. Due to the unavailability of the Court on April 24, 2023, the need to accommodate the
23 parties' schedules, and so that the parties have sufficient time to finalize and file the plea
24 agreement in this case, the parties are requesting that the current change of plea hearing
25 scheduled for April 24, 2023, at 8:30 a.m., be continued to May 22, 2023, at 8:30 a.m.

26 The requested continuance is made with the intention of conserving time and resources
27 for both the parties and the Court. The government is in agreement with this request and the
28 requested date is a mutually agreeable date for both parties. The parties stipulate that for the

1 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
2 date of this order through May 22, 2023, for defense preparation and investigation, pursuant to
3 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice are served by
4 resetting the status conference date outweigh the best interest of the public and the defendant in a
5 speedy trial.

6
7 Respectfully submitted,

8 HEATHER E. WILLIAMS
9 Federal Defender

10 Date: April 13, 2023

/s/ Reed Grantham
11 REED GRANTHAM
12 Assistant Federal Defender
13 Attorney for Defendant
14 RAMON MAGANA

15 PHILLIP A. TALBERT
16 United States Attorney

17 Date: April 13, 2023

/s/ Jessica Massey
18 JESSICA MASSEY
19 Assistant United States Attorney
20 Attorney for Plaintiff
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ORDER

IT IS SO ORDERED. The change of plea hearing set for April 24, 2023, at 8:30 a.m. is hereby continued to May 22, 2023, at 8:30 a.m.

The time through May 22, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: April 14, 2023


UNITED STATES DISTRICT JUDGE