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Attorneys for Defendant
RAMON MAGANA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMON MAGANA,

Defendant.

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

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant Federal Defender Reed Grantham, counsel for Ramon Magana, that the change of plea hearing currently scheduled for May 22, 2023, at 8:30 a.m. be continued to June 26, 2023, at 8:30 a.m.

On March 7, 2023, this matter was set for a change of plea hearing on April 24, 2023. *See* Dkt. #77. Due to the unavailability of the Court on April 24, 2023, the need to accommodate the parties' schedules, and so that the parties have sufficient time to finalize and file the plea agreement in this case, the change of plea hearing was continued to May 22, 2023, at 8:30 a.m. The parties are in the process of finalizing the resolution of this matter. Accordingly, the parties are requesting that the matter be continued to June 26, 2023, at 8:30am for a change of plea hearing.

The requested continuance is made with the intention of conserving time and resources

1 for both the parties and the Court. The government agrees

2 with this request and the requested date is a mutually agreeable date for both parties. The
3 parties stipulate that for the purpose of computing time under the Speedy Trial Act, the Court
4 should exclude time from the date of this order through June 26, 2023, for defense preparation
5 and investigation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the
6 ends of justice are served by resetting the status conference date outweigh the best interest of the
7 public and the defendant in a speedy trial.

8
9 Respectfully submitted,

10 HEATHER E. WILLIAMS
11 Federal Defender

12 Date: May 15, 2023

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

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16 PHILLIP A. TALBERT
United States Attorney

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18 Date: May 15, 2023

/s/ Kimberly Sanchez
19 KIMBERLY SANCHEZ
Assistant United States Attorney
20 Attorney for Plaintiff

ORDER

IT IS SO ORDERED. The change of plea hearing set for May 22, 2023, at 8:30 a.m. is hereby continued to June 26, 2023, at 8:30 a.m.

The time through June 26, 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: May 15, 2023


UNITED STATES DISTRICT JUDGE