

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 REED GRANTHAM, CA Bar #294171
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

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-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 Kimberly Sanchez, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Ramon Magana, that the change of plea hearing
20 currently scheduled for June 26, 2023, at 8:30 a.m. be continued to August 7, 2023, at 8:30 a.m.

21 This matter is currently set for a change of plea on June 26, 2023. However, additional
22 time is needed by the parties to finalize the plea agreement in this case and to prepare and submit
23 relevant documents prior to the change of plea hearing. Accordingly, the parties request that the
24 matter be continued to August 7, 2023, for a change of plea hearing.

25 The requested continuance is made with the intention of conserving time and resources
26 for both the parties and the Court. The government agrees with this request and the requested
27 date is a mutually agreeable date for both parties. The parties stipulate that for the purpose of
28 computing time under the Speedy Trial Act, the Court should exclude time from the date of this

1 order through August 7, 2023, for defense preparation and investigation, pursuant to 18 U.S.C. §
2 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice are served by resetting the
3 status conference date outweigh the best interest of the public and the defendant in a speedy trial.

4 Respectfully submitted,

5 HEATHER E. WILLIAMS
6 Federal Defender

7 Date: June 13, 2023

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

10 PHILLIP A. TALBERT
11 United States Attorney

12 Date: June 13, 2023

/s/ Kimberly Sanchez
13 KIMBERLY SANCHEZ
14 Assistant United States Attorney
Attorney for Plaintiff

15
16 **ORDER**

17 **IT IS SO ORDERED.** The change of plea hearing set for June 26, 2023, at 8:30 a.m. is
18 hereby continued to August 7, 2023, at 8:30 a.m.

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

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23
24 IT IS SO ORDERED.

25 Dated: June 13, 2023

26 
UNITED STATES DISTRICT JUDGE