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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-ADA-BAM

STIPULATION TO VACATE TRIAL
CONFIRMATION AND TRIAL AND SET
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 trial confirmation, and
20 trial date, currently scheduled for March 20, 2023, and April 4, 2023, respectively, may be
21 vacated and a change of plea hearing date be set for April 24, 2023, at 8:30 a.m.

22 On September 23, 2022, this matter was set for a trial confirmation hearing on March 20,
23 2023, and a trial on April 4, 2023. *See* Dkt. #73. The parties are in the process of working on a
24 plea resolution to this matter, and are requesting to vacate the current trial confirmation and trial
25 date, and to set a change of plea hearing for April 24, 2023, so that the parties have time to
26 finalize their discussions.

27 The requested continuance is made with the intention of conserving time and resources
28 for both the parties and the Court. The government is in agreement with this request and the

1 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
2 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
3 date of this order through April 24, 2023, for defense preparation and investigation, pursuant to
4 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice are served by
5 resetting the status conference date outweigh the best interest of the public and the defendant in a
6 speedy trial.

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8 Respectfully submitted,

9 HEATHER E. WILLIAMS
10 Federal Defender

11 Date: March 3, 2023

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

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15 PHILLIP A. TALBERT
16 United States Attorney

17 Date: March 3, 2023

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

IT IS SO ORDERED. The trial confirmation hearing set for March 20, 2023, and the trial set for April 4, 2023, are hereby vacated. A change of plea hearing is set for April 24, 2023, at 8:30 a.m.

The time through April 24, 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: March 6, 2023


UNITED STATES DISTRICT JUDGE