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Attorney for Defendant
Cruz Mora

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA Plaintiff vs. CRUZ MORA, And ARMANDO SOLIS, Defendants.	No. Cr.S-04-377 MCE STIPULATION AND ~~[PROPOSED]~~ ORDER CONTINUING STATUS Date: July 19, 2005 Time: 8:30 AM Court: MCE

It is hereby stipulate between the parties, by and through their respective counsel as follows:

The current Status Conference date of April 19, 2005 be vacated and a new Status Conference be set for July 19, 2005, at 8:30 AM.

This continuance is necessary because defense counsel, Jesse Santana is currently in trial and is in the process of reviewing approximately 1,500 pages of government produced

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discovery. In addition, the government has advised that it intends to produce additional discovery over approximately the next four weeks and that defense counsel should review.

For all of these reasons, the parties jointly request a new status conference date, and that time be excluded from April 19, 2005, up to and including July 19, 2005 under the Speedy Trial Act pursuant to 18 U.S.C. Section 3161(h)(8)(B)(iv) and Local Code T4 for defense preparation and based upon a finding by the Court that the ends of justice served by granting a continuance outweigh the best interest of the public and the defendants in a speedy trial.

Counsel for Cruz Mora has met with his client and has explained to him his rights under Title 18 U.S.C. section 3161 – 3174 (Speedy Trial Act). Specifically, I have explained to defendant Mora that he has the right to be brought to trial within 70 days from the time of his arraignment. Defendant Mora acknowledges that he has been informed of his rights under Title 18 U.S.C. section 3161 – 3174 (Speedy Trial Act) and has authorized his attorney to continue this matter up to and including July 19, 2005 and to set times and delays under the provisions of that Act.

Counsel has been informed and believes that attorney Jesse Santana has explained these same rights to his client, Armando

Solis who has given the same assurances and authorizations. Counsel also states that he has been authorized to submit this request on behalf of all parties.

Respectfully submitted,

Dated: April 17, 2005

/S/
Michael B. Bigelow
Attorney for Defendant Mora

Dated: April 17, 2005

/S/
Jesse Santana
Attorney for Defendant Solis

Dated: April 17, 2005

/S/
Phillip Talbert
Assistant United Attorney

ORDER

FOR GOOD CAUSE SHOWN

It is so ordered.

Date: April 18, 2005.

MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE