Case 2:06-cr-00441-DAD Document 253 Filed 09/26/08 Page 1 of 3 John R. Manning 1 Attorney at Law Ca. St. Bar No. 220874 2 1111 H Street, Suite 204 3 Sacramento, CA 95814 Telephone: (916) 444-3994 4 Attorney for Defendant RICARDO VENEGAS 5 6 7 IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA 8 9 10 UNITED STATES OF AMERICA, CR NO. S-06-0441 GEB) Plaintiff, 11) STIPULATION AND) [PROPOSED] ORDER CONTINUING 12 STATUS CONFERENCE v. 13 EFRAIN MEDINA, et al, 9/26/08) Date: 14 Defendants. Time: 9:00 a.m.) Hon. Garland E. Judge: 15 Burrell, Jr. 16 IT IS HEREBY stipulated between the United States of America

through its undersigned counsel, Jill M. Thomas, Assistant United States Attorney, together with counsel for defendant Ricardo Venegas, John R. Manning Esq., counsel for defendant Wendell Stewart, Daniel M. Davis, Esq., counsel for defendant Valerie White, William E. Bonham, Esq., counsel for defendant Pablo Farias-Segura, Jessie J. Garcia, Esq., counsel for defendant Arturo Farias-Segura, Diana L. Weiss, Esq., and counsel for defendant Isauro Jauregui Catalan, J Toney, Esq., that the status conference presently set for September 26, 2008 be **continued to November 14, 2008, at 9:00 a.m.**, thus **vacating** the presently set status conference.

1

17

18

19

20

21

22

23

24

25

26

27

Case 2:06-cr-00441-DAD Document 253 Filed 09/26/08 Page 2 of 3

Counsel for the parties agree that this is an appropriate 1 exclusion of time within the meaning of Title 18, United States 2 3 Code § 3161(h)(8)(B)(iv) (continuity of counsel/ reasonable time 4 for effective preparation, specifically the requested continuance is based upon more time needed to review discovery) and Local 5 Code T4, and agree to exclude time from the date of the filing of 6 7 the order until the date of the status conference, November 14, 2008. 8 IT IS SO STIPULATED. 9 Dated: September 24, 2008 /s/ John R. Manning 10 JOHN R. MANNING 11 Attorney for Defendant Ricardo Venegas 12 Dated: September 24, 2008 /s/ Daniel M. Davis DANIEL M. DAVIS 13 Attorney for Defendant 14 Wendell Stewart /s/ William E. Bonham 15 Dated: September 24, 2008 WILLIAM E. BONHAM 16 Attorney for Defendant Valerie White 17 Dated: September 24, 2008 /s/ Jesse J. Garcia JESSE J. GARCIA 18 Attorney for Defendant 19 Pablo Farias-Segura 20 Dated: September 24, 2008 /s/ Diana L. Weiss DIANA L. WEISS 21 Attorney for Defendant Arturo Farias-Segura 22 Dated: September 24, 2008 /s/ J Toney J TONEY 23 Attorney for Defendant 24 Isauro Jauregui Catalan 25 Dated: September 24, 2008 McGREGOR W. SCOTT United States Attorney 26 by: <u>/s/</u>Jill M. Thomas 27 JILL M. THOMAS Assistant U.S. Attorney 28 2

Case 2:06-cr-00441-DAD Document 253 Filed 09/26/08 Page 3 of 3

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

4 UNITED STATES OF AMERICA,
5 Plaintiff,
6 v.
7 EFRAIN MEDINA, et al.,

Defendants.

) Case No. CR.S-06-0441-GEB

[PROPOSED] ORDER TO CONTINUE STATUS CONFERENCE

GOOD CAUSE APPEARING, it is hereby ordered that the September 26, 2008 status conference be continued to November 14, 2008 at 9:00 a.m. I find that the ends of justice warrant an exclusion of time and that the defendant's need for continuity of counsel and reasonable time for effective preparation exceeds the public interest in a trial within 70 days. THEREFORE IT IS FURTHER ORDERED that time be excluded pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 from the date of this order to November 14, 2008.

IT IS SO ORDERED.

Dated: September 25, 2008

Ε. AND

United States District Judge

1

2

3