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4 Attorney for Defendant
5 OSCAR SALAZAR LOPEZ

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

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 ORLANDO ISRAEL SALAZAR
15 LOPEZ,
16 Defendants.

No. CR-S 08-561-EJG

STIPULATION AND ORDER

Date: February 26, 2010
Time: 10:00 a.m.
Hon. Edward J. Garcia

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19 Defendants Orlando Israel Salazar Lopez, Laura Plascencia Garcia, Bobby
20 Wilkerson, Jr., Sioeli Tanaki Vilingia, Jose Leobardo Castro, Bruno Ramon Sanchez
21 Yanez, Pedro Ernesto Ortiz, and Jorge Ramos Rodelo, through their respective counsel,
22 and the United States, through its counsel, hereby stipulate and request that the Court
23 continue the status conference in the above-captioned case from January 29, 2010, to
24 **February 26, 2010, at 10:00 a.m.**

25 All the listed defendants are charged in this case with conspiracy to distribute and
26 possess with the intent to distribute controlled substances in violation of 21 U.S.C.
27 §§ 841(a)(1) and 846, as well as other offenses. The indictment is the result of a wiretap
28 investigation. At the last status conference, the Court set a trial confirmation hearing on

1 September 24, 2010 and a jury trial on October 25, 2010. A status conference was set as a
2 control date for January 29, 2010. Counsel are continuing to prepare for trial and/or plea
3 and do not believe a status conference on January 29, 2010 will be productive. To date,
4 not counting transcripts which are not bates stamped, defense counsel have received more
5 than 3,100 pages of discovery, surveillance photos and videos, recorded meetings and
6 phone calls with the undercover informant, and hundreds of recorded wiretap-intercepted
7 phone calls. The vast majority of recorded calls are in Spanish. Counsel also estimates
8 that there are well over 1,000 pages of transcripts. Some counsel are also in the process of
9 negotiation in anticipation of a plea. Counsel believe a status conference at the end of
10 February will be more appropriate and thus ask that the status conference be continued
11 from January 29, 2010 to February 26, 2010.

12 At the last status conference, the Court made a finding that this case is “complex”
13 and has excluded time under the Speedy Trial Act on this ground and for defense
14 preparation through the trial date of October 25, 2010. For the reasons set forth above, the
15 parties stipulate and request that the Court continue to exclude time within which the trial
16 must commence under the Speedy Trial Act through October 25, 2010, for defense
17 preparation and complexity under 18 U.S.C. § 3161(h)(8)(B)(ii) and (iv) (local codes T2
18 and T4).

19 Respectfully submitted,

20 Dated: January 27, 2010

21 /s/ John Balazs
22 JOHN BALAZS
23 Attorney for Defendant
24 ORLANDO ISRAEL SALAZAR LOPEZ

25 Dated: January 27, 2010

26 /s/ Krista Hart
27 KRISTA HART
28 Attorney for Defendant
LAURA PLASCENCIA GARCIA

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2 Dated: January 27, 2010

3 /s/ Danny D. Brace, Jr.
4 DANNY D. BRACE, Jr.
Attorney for Defendant
BOBBY WILKERSON, JR.

5 Dated: January 27, 2010

6 /s/ Fred Neal Dawson
7 FRED NEAL DAWSON
Attorney for Defendant
SIOELI TANAKI VILLINGIA

8 Dated: January 27, 2010

9 /s/ Dwight M. Samuel
10 DWIGHT M. SAMUEL
Attorney for Defendant
JOSE LEOBARDO CASTRO

11 Dated: January 27, 2010

12 /s/ Gilbert A. Roque
13 GILBERT A. ROQUE
Attorney for Defendant
BRUNO RAMON SANCHEZ YANEZ

14 Dated: January 27, 2010

15 /s/ Dan Frank Koukol
16 DAN FRANK KOUKOL
Attorney for Defendant
PEDRO ERNESTO ORTIZ

17 Dated: January 27, 2010

18 /s/ Hector Cavazos, Jr.
19 HECTOR CAVAZOS, JR.
Attorney for Defendant
Jorge Ramos Rodelo

20 LAWRENCE G. BROWN
U.S. Attorney

21 Dated: January 27, 2010

22 By: /s/ Jill Marie Thomas
23 JILL MARIE THOMAS
Assistant U.S. Attorney

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ORDER

IT IS SO ORDERED.

Dated: January 27, 2010

/s/ Edward J. Garcia
HON. EDWARD J. GARCIA
U.S. District Judge

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