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4 Attorney for Defendant
5 OSCAR SALAZAR LOPEZ

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7
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: June 5, 2009

Time: 10:00 a.m.

Hon. Edward J. Garcia

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18
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, through their respective counsel, and the United States,
22 through its counsel, hereby stipulate and request that the Court continue the status
23 conference in the above-captioned case from April 10, 2009, to **June 5, 2009, at 10:00**
24 **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.

1 To date, defense counsel have received more than 3,000 pages of discovery,
2 surveillance photos and videos, recorded meetings and phone calls with the undercover
3 informant, and hundreds of recorded wiretap-intercepted phone calls. The vast majority of
4 recorded calls are in Spanish. Further, counsel has received transcripts of many of the
5 recorded phone calls, which contain translations into English.

6 The Court has previously made a finding that this case is “complex” and has
7 excluded time under the Speedy Trial Act on this ground and for defense preparation
8 through April 10, 2009. This continuance is requested because defendants’ counsel need
9 additional time to prepare, including reviewing discovery, obtaining transcripts of taped
10 conversations and other needed records, identifying and interviewing potential witnesses,
11 conducting legal research, and identifying potential motions to be filed. For these reasons,
12 the parties stipulate and request that the Court exclude time within which the trial must
13 commence under the Speedy Trial Act from April 10, 2009 through June 5, 2009, for
14 defense preparation and complexity under 18 U.S.C. § 3161(h)(8)(B)(ii) and (iv) (local
15 codes T2 and T4).

16 Respectfully submitted,

17 Dated: April 6, 2009

18 /s/ John Balazs
19 JOHN BALAZS
20 Attorney for Defendant
21 ORLANDO ISRAEL SALAZAR LOPEZ

22 Dated: April 6, 2009

23 /s/ Krista Hart
24 KRISTA HART
25 Attorney for Defendant
26 LAURÁ PLASCENCIA GARCIA

27 Dated: April 6, 2009

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

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1 Dated: April 6, 2009

2 /s/ Fred Neal Dawson
3 FRED NEAL DAWSON
4 Attorney for Defendant
5 SIOELI TANAKI VILLINGIA

6 Dated: April 6, 2009

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

11 Dated: April 6, 2009

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

16 Dated: April 6, 2009

17 /s/ Dan Frank Koukol
18 DAN FRANK KOUKOL
19 Attorney for Defendant
20 PEDRO ERNESTO ORTIZ

21 Dated: April 6, 2009

22 LAWRENCE G. BROWN
23 U.S. Attorney

24 By: /s/ Jill Marie Thomas
25 JILL MARIE THOMAS
26 Assistant U.S. Attorney

27 **ORDER**

28 **IT IS SO ORDERED.** For the reasons stated above, the Court finds that the needs of defense counsel to prepare outweigh the public and the defendants' interest in a speedy trial, and therefore the continuance and exclusion of time are in the interest of justice.

Dated: April 6, 2009

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