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| 1  | Olaf W. Hedberg, SBN #151082<br>1107 9 <sup>th</sup> St. Suite 850                              |  |  |
|----|---|--|--|
| 2  | Sacramento, CA 95814  |  |  |
| ,  | (916) 447-1192  |  |  |
| 3  | Attorney for Defendant  |  |  |
| 4  | IN THE UNITED STATES DISTRICT COURT<br>FOR THE EASTERN DISTRICT OF CALIFORNIA                   |  |  |
| 5  |   |  |  |
|    |   |  |  |
| 6  |   |  |  |
| 7  |   |  |  |
| 0  | UNITED STATES OF AMERICA  | No. 2:09-CR-193 FCD                                |  |
| 8  | Plaintiff,  | STIPULATION AND ORDER.                             |  |
| 9  | vs.   | )  |  |
| 10 | EDANIZ DALII TUDNED ID  | Date: April 26, 2010                               |  |
|    | FRANK PAUL TURNER, JR.<br>LESLIE MILLER BELL, JR.   | Time: 10 am  |  |
|    | ANTHONY BERNARD WILSON et al  | Judge: Hon. Frank C. Damrell, Jr.                  |  |
| 11 | ANTHON I BERNARD WILSON et al   | )  |  |
| 12 | Defendant.  |  |  |
|    |   | _  |  |
| 13 |   |  |  |
| 14 | IT IS HEREBY STIPULATED by and between the parties hereto through their                         |  |  |
| 15 | respective counsel, JILL THOMAS, Assistant Untied States Attorney, attorney for Plaintiff,      |  |  |
| 16 | OLAF HEDBERG, attorney for defendant FRANK PAUL TURNER, JR., SHARI RUSK,                        |  |  |
| 17 | attorney for LESLIE MILLER BELL, JR. and MICHAEL LONG, attorney for ANTHONY                     |  |  |
| 18 | BERNARD WILSON that the status conference now scheduled for April 26, 2010 at 10 am be          |  |  |
| 19 | vacated and a new date of June 28, 2010 at 10 am be set for status conference. Defendant        |  |  |
| 20 | Anthony Bernard Wilson has only recently been added (as of April 7, 2010) to this case, and his |  |  |
| 21 | counsel has only begun to receive discovery.  | In addition, the parties have been negotiating the |  |
| 22 | Pa  | ge 1 of 3  |  |

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| 1  | terms of a proposed plea agreement.   |
|----|---|
| 2  | It is further stipulated and agreed between the parties that the period beginning April. 26,        |
| 3  | 2010 and ending June 28, 2010, should be excluded in computing the time within which the trial      |
| 4  | of the above criminal prosecution must commence for the purpose of the Speedy Trial Act for         |
| 5  | defense preparation. The defense has been engaged in ongoing legal research and investigation.      |
| 5  | All parties stipulate and agree that this is an appropriate exclusion of time within the meaning of |
| 7  | Title 18, United States Code, Section 3161(h)(8)(iv) (Local Code T4).                               |
| 3  |   |
| )  | Respectfully submitted,   |
|    | Dated this April 21, 2010   |
| 10 | By <u>/s/ Olaf Hedberg</u>  |
|    | Olaf W. Hedberg, Attorney at Law  |
| 11 | Attorney for Frank Paul Turner, Jr.   |
| 12 |   |
|    | Dated this April 21, 2010   |
| 13 | By /s/ Shari Rusk   |
|    | Shari Rusk, Attorney at Law   |
| 14 | Attorney for Leslie Miller Bell, Jr.  |
| 15 | Dated this April 21, 2010   |
|    | by /s/ Michael Long   |
| 16 | Michael Long  |
|    | Attorney for Anthony Wilson   |
| 17 |   |
|    | Dated this April 21, 2010   |
| 18 | Lawrence Brown  |
|    | Acting United States Attorney   |
| 19 | /s/ Olaf Hedberg for Jill Thomas  |
|    | Jill Thomas   |
| 20 | Assistant U.S. Attorney   |
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