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4 Attorney for Defendant AGUILAR LARA

5
6 **UNITED STATES DISTRICT COURT**
7 **EASTERN DISTRICT OF CALIFORNIA**
8

9 UNITED STATES OF AMERICA,
10
11 Plaintiff,

Case No. CR-S-09-0358 WBS

12 vs.

**STIPULATION AND [PROPOSED]
ORDER TO EXCLUDE TIME**

13 ERIK F. AGUILAR LARA, et al.,
14 Defendants.
15 _____/

16
17 The parties hereby stipulate that the status conference in this case be continued
18 from June 13, 2011, to July 25, 2011, at 8:30 a.m. The parties stipulate that the time
19 between June 13, 2011, and July 25, 2011, should be excluded from the calculation of
20 time under the Speedy Trial Act. The parties stipulate that the ends of justice are served
21 by the Court excluding such time, so that counsel for the defendant may have reasonable
22 time necessary for effective preparation, taking into account the exercise of due diligence.
23 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4. Specifically, counsel for defendants
24 needs additional time to review the discovery and investigate the case. Therefore the
25 parties have stipulated to continue the status conference in this case. The parties stipulate
26 and agree that the interests of justice served by granting this continuance outweigh the

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1 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161
2 (h)(7)(A).

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4 Respectfully submitted

5 Date: June 8, 2011

6 /s/ Tim A. Pori
TIM A. PORI
Attorney for Defendant AGUILAR LARA

7
8 Date: June 9, 2011

9 /s/ Heiko Philipp Coppola
HEIKO PHILIPP COPPOLA
Assistant U.S. Attorney

10
11 Date: June 9, 2011

12 /s/ Michael Petrik
MICHAEL PETRIK
Attorney for Defendant JOSE ZAPIEN

13 Date: June 9, 2011

14 /s/ Gilbert Roque
GILBERT ROQUE
Attorney for Defendant RAMIRO SUAREZ

15
16 Date: June 9, 2011

17 /s/ Olaf Hedberg
OLAF HEDBERG
Attorney for Defendant JOSE FERNANDEZ

18 Date: June 9, 2011

19 /s/ Clemente Jimenez
CLEMENTE JIMENEZ
Attorney for Defendant JOSE GUTIERREZ

20
21 Date: June 9, 2011

22 /s/ Christopher Cosca
CHRISTOPHER COSCA
Attorney for Defendant ALEJANDRO
GUTIERREZ

23
24 Date: June 9, 2011

25 /s/ Ruben Munoz
RUBEN MUNOZ
Attorney for Defendant ADOLFO ALVAREZ

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ORDER

IT IS HEREBY ORDERED that the Status Conference in the above-entitled matter is continued to July 25, 2011, at 8:30 a.m. before the Honorable William Shubb.

DATED: June 9, 2011



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE