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Attorney for Defendant
Nicholas Ramirez

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, vs. NICHOLAS RAMIREZ, TIFFANY BROWN Defendant	Case No. 2:11-cv-00190 MCE STIPULATION TO CONTINUE STATUS; ORDER THEREON

Plaintiff United States of America, by and through its counsel of record, and the defendant's herein, by and through their counsel of record, hereby stipulates as follows:

By previous order, this matter was set for status on May 27, 2015.

By this stipulation, defendants now move to continue the status conference until July 30, 2015 and to exclude time between May 27, 2015, and July 30, 2015 under Local Code T4. Plaintiff does not oppose this request.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Counsel for defendants desire additional time to review documents and to consult with their clients in efforts to resolve this case.

The government does not object to the continuance.

Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 27, 2015 to July 30, 2015, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial pursuant to 18 U.S.C. § 3161(h).

Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

DATED: May 26, 2015

Respectfully submitted

/S/MICHAEL B. BIGELOW
Michael B. Bigelow
Attorney for Nicholas Ramirez

IT IS SO STIPULATED.

/S/ JASON HITT
Jason Hitt, Esq., Dated: May 26, 2015
Assistant United States Attorney
Attorney for Plaintiff

/S/MICHAEL B. BIGELOW Dated: May 26, 2015
Michael B. Bigelow
Attorney for Defendant
Nicholas Ramirez

/s/Dina Santos
Dina Santos, Dated: May 26, 2015
Attorney for Tiffany Brown

ORDER

In accordance with the foregoing stipulation, and good cause appearing therefor, the above referenced matter shall be continued for status hearing until July 30, 2015 at 9:00 a.m., with time excluded for the reasons set forth above.

IT IS SO ORDERED.

Dated: May 29, 2015

MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT