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5 Attorney for Defendant
6 FELIPE SOLIS

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) Case No. 2:12-cr-00079-MCE
12)
Plaintiff,) **AMENDED** STIPULATION AND ORDER
13) CONTINUING CASE
v.)
14) Date: March 22, 2012
FELIPE SOLIS,) Time: 9:00 a.m.
15) Judge: Morrison C. England, Jr.
Defendant.)
16)
17 -----)

18 IT IS HEREBY STIPULATED by and between the United States of
19 America through Richard Bender, Assistant United States Attorney,
20 and FELIPE SOLIS, by and through his counsel, Jeffrey L. Staniels,
21 Assistant Federal Defender, that the status conference in the above
22 captioned case now set for March 22, 2012, be vacated and re-
23 calendared for May 3, 2012, at 9:00 a.m.

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1 This continuance is jointly agreed to in light of the very
2 recent appointment of the Office of the Federal Defender on March
3 19, 2012, and the representation by Mr. Bender that "voluminous"
4 discovery, which he has agreed to provide by the end of this week
5 subject to initial constraints already agreed to by undersigned
6 counsel, needs to be assembled and made available. Informal
7 discussion makes clear that an opportunity to review discovery and
8 confer with the defendant is necessary in order to obtain a grasp
9 of the nature of the case and to evaluate what investigation,
10 possible motions, and other defense preparation is necessary. Mr.
11 Bender has also advised that events took place in at least three
12 widely separated federal districts, a potential complicating factor
13 of as yet undetermined impact on defense preparation.

14 IT IS ALSO STIPULATED that time for trial under the Speedy
15 Trial Act be excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv),
16 Local Code T-4, from March 22, 2012 through May 3, 2012, and that
17 for the reasons stated, granting this continuance outweighs the
18 interests of the public and the defendant in a Speedy Trial.

19 IT IS SO STIPULATED.

20 Dated: March 20, 2012

21 Respectfully submitted,

22 DANIEL J. BRODERICK
23 Federal Defender

24 /s/ JEFFREY L. STANIELS
25 JEFFREY L. STANIELS
26 Assistant Federal Defender
27 Attorney for Defendant
28 FELIPE SOLIS

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1 Dated: March 20, 2012

2 BENJAMIN B. WAGNER
3 United States Attorney

4 /s/ Richard Bender
5 Richard Bender
6 Assistant U.S. Attorney
7 Attorneys for Plaintiff

8 **O R D E R**

9 The foregoing stipulation of counsel is accepted. The status
10 conference currently set for March 22, 2012 is hereby VACATED. This
11 matter is ordered to be calendared for status conference on May 3,
12 2012, at 9:00 a.m. on this court's regular criminal calendar.

13 Time for Trial under the Speedy Trial Act is excluded pursuant
14 to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4. The court finds
15 that the reasons stated constitute good cause for the continuance
16 and that the need therefor outweighs the interests of the public and
17 the defendant in a speedy trial.

18 **IT IS SO ORDERED.**

19 Dated: March 29, 2012

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21 MORRISON C. ENGLAND, JR.
22 UNITED STATES DISTRICT JUDGE
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