

DANIEL J. BRODERICK, Bar #89424
Federal Defender
JEFFREY L. STANIELS, Bar #91413
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700

Attorney for Defendant
FELIPE SOLIS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

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

IT IS HEREBY STIPULATED by and between the United States of America through Richard Bender, Assistant United States Attorney, and FELIPE SOLIS, by and through his counsel, Jeffrey L. Staniels, Assistant Federal Defender, that the status conference in the above captioned case now set for May 3, 2012, be vacated, and that a motions schedule and trial schedule be established as follows:

| | |
|---|---------------------------|
| All Pretrial Motions to be Filed by | June 1, 2012 |
| All Oppositions to Motions to be Filed by | June 25, 2012 |
| Any Replies to Motions to be Filed by | July 9, 2012 |
| Motions Hearing | July 19, 2012 |
| Trial Confirmation | September 13, 2012 |

Jury Trial

October 29, 2012

This continuance is jointly agreed to order to obtain a trial schedule that is thought to be realistically possible to adhere to assuming no major obstacles to completing preparation are encountered. The parties will continue to explore alternatives to trial along with investigation and other preparation. Consideration to other work related commitments and counsel's hopes for family time off have also been accounted for in proposing these dates.

IT IS ALSO STIPULATED that time for trial under the Speedy Trial Act be excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4, from May 3, 2012 through October 29, 2012, and that for the reasons stated, granting this continuance outweighs the interests of the public and the defendant in a more speedy trial than proposed.

IT IS SO STIPULATED.

Dated: May 1, 2012

Respectfully submitted,

DANIEL J. BRODERICK
Federal Defender

/s/ JEFFREY L. STANIELS
JEFFREY L. STANIELS
Assistant Federal Defender
Attorney for Defendant
FELIPE SOLIS

Dated: May 1, 2012

BENJAMIN B. WAGNER
United States Attorney

/s/ Richard Bender
Richard Bender
Assistant U.S. Attorney
Attorneys for Plaintiff


O R D E R

The foregoing stipulation of counsel is accepted. The status conference currently set for May 3, 2012 is hereby VACATED. The motions and trial schedule set forth above is accepted. The clerk is directed to place this matter on calendar for motions hearing, trial confirmation, and jury trial as set forth in that schedule. In the event that alterations to this schedule are thought to be needed, counsel are directed promptly to meet and confer and to advise the court of any time changes or requests for the same promptly thereafter.

Time for Trial under the Speedy Trial Act is excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4 until October 29, 2012. The court finds that the reasons stated constitute good cause for the continuance and that the need therefor outweighs the interests of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: May 3, 2012


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE