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8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)
) Mag. 13-mj-006 AC
12 Plaintiff,)
) STIPULATION AND
13 v.) ORDER CONTINUING PRELIMINARY
) HEARING
14)
15 CURTIS DANE SANDERS, and)
and FREDERICK EDWRDS,)
)
16 Defendants.)
)
17

18 IT IS HEREBY STIPULATED between Plaintiff United States of
19 America, by and through Assistant United States Attorney Todd D.
20 Leras, and Attorney Michael D. Long, Counsel for Curtis Dane
21 Sanders, and Attorney Olaf Hedberg, Counsel for Defendant
22 Frederick Edwards, that the preliminary hearing scheduled for
23 June 13, 2013, be continued to July 1, 2013, at 2:00 p.m.

24 Defense counsel and government counsel have been working
25 toward pre-indictment resolution of this matter. That process
26 includes the exchange of information and investigation related to
27 the facts of the incidents underlying the charges in the criminal
28 complaint, the criminal histories of both defendants (including

1 the relevant facts of prior drug convictions to determine whether
2 or not they provide the basis for enhanced sentencing), and the
3 relevant estimated guideline calculations applicable to each
4 defendant. Defense counsel and government counsel believe that
5 this early exchange of information is beneficial to a potential
6 expedited resolution of charging and potential sentencing issues
7 presented in the case. In light of the settlement discussions
8 and the need to conduct the additional investigation, all parties
9 are requesting additional time for attorney preparation.

10 The government and the defendants agree that the combination
11 of settlement discussions and additional investigation constitute
12 good cause to extend the time for preliminary hearing under
13 Federal Rule of Criminal Procedure 5.1(d), as well as under the
14 Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv). This exclusion
15 of time includes the period up to and including July 1, 2013.

16 Michael Long and Olaf Hedberg agree to this request and have
17 authorized Assistant United States Attorney Todd D. Leras to sign
18 this stipulation on their behalf.

19
20 DATED: June 12, 2013 By: /s/ Todd D. Leras
TODD D. LERAS
Assistant U.S. Attorney

21
22 DATED: June 12, 2013 By: /s/ Todd D. Leras for
MICHAEL D. LONG
Attorney for Defendant
CURTIS SANDERS

23
24 DATED: June 12, 2013 By: /s/ Todd D. Leras for
OLAF HEDBERG
Attorney for Defendant
FREDERICK EDWARDS

