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SABER SHEHADEH

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, vs. SABER SHEHADEH, Defendant.	Case No.: 2:16-cr-038 MCE STIPULATION AND ORDER FOR RETURN OF PASSPORT

The parties to this action, Plaintiff United States of America by and through Assistant United States Attorney Chris Hales, and Defendant Saber Shehadeh by and through his attorney Todd D. Leras, hereby stipulate as follows:

1. On March 28, 2016, United States Magistrate Judge Kendall J. Newman ordered Defendant Saber Shehadeh released on a release package including an unsecured bond in the amount of $250,000 (ECF Entry 23) and General and Special Conditions

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of Release (ECF Entry 26, 27). Special Condition of Release Number 6 required Saber Shehadeh to surrender his passport to the Clerk of the United States District Court during the pendency of the case. Saber Shehadeh surrendered his passport on April 1, 2016 (ECF Entry 29).

2. On May 2, 2019, following conviction by a jury on three counts of Mail Fraud, this Court sentenced Saber Shehadeh to 57-months imprisonment (ECF Entries 417 and 418).

3. On December 11, 2020, this Court granted a reduction of Saber Shehadeh's term of imprisonment based on compassionate release considerations due to his medical condition (ECF Entries 446 and 452). Saber Shehadeh has been released from custody and is presently serving a 36-month term of supervised release. Saber Shehadeh is supervised by a probation officer assigned to the Northern District of California's Oakland probation office.

4. Saber Shehadeh needs his passport to establish eligibility for health coverage required to address his present medical circumstances. Both the government and defense counsel have confirmed that Saber Shehadeh's supervising probation officer in the Northern District of California has no objection to release of the passport. Saber Shehadeh has no plans to travel internationally during the term of his supervised release.

Based on the above stipulation of facts, the parties further stipulate and agree that the clerk release and return the passport to Saber Shehadeh.

Assistant U.S. Attorney Christopher Hales has reviewed this stipulation and authorized Todd D. Leras via email to sign it on his behalf.

IT IS SO STIPULATED.

DATED: January 20, 2021

McGREGOR SCOTT
United States Attorney

By /s/ *Todd D. Leras for*
CHRISTOPHER HALES
Assistant United States Attorney

DATED: January 20, 2021

By /s/ *Todd D. Leras*
TODD D. LERAS
Attorney for Defendant
SABER SHEHADEH

ORDER

BASED ON THE STIPULATION OF THE PARTIES, the Clerk of this Court is directed to release to Saber Shehadeh the passport he surrendered by order of this Court as Special Condition of Release Number Six in this matter (ECF Entries 26 and 29).

IT IS SO ORDERED.

Dated: January 21, 2021

KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

[Type body of pleading here.]