

ALEX G. TSE (CABN 152348)
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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|---------------------------|---|---|
| UNITED STATES OF AMERICA, |) | CASE NO. CR-15-00547-3 JD |
| |) | |
| Plaintiff, |) | STIPULATION AND [PROPOSED] ORDER |
| |) | CONTINUING SENTENCING DATE |
| v. |) | |
| |) | |
| DANIEL JIMENEZ, |) | |
| |) | |
| Defendant. |) | |
| |) | |

STIPULATION

The United States of America and defendant Daniel Jimenez, by and through their respective counsel, with the agreement of U.S. Probation, hereby stipulation and ask the Court to find as follows:

1. Defendant Jimenez is currently scheduled for sentencing on June 27, 2018.
2. Defendant Jimenez is facing a mandatory minimum sentence of 10 years. The government is expected to recommend a sentence of greater than 10 years.
3. Counsel for the government has a conflict on the currently scheduled sentencing date of June 27, 2018. Specifically, counsel is scheduled to argue motions to suppress evidence in *United States v. Daniel Chavez et al.*, Case No. CR. 15-285 LHK, in San Jose at 9:15 a.m. on June 27, 2018.
4. Given this conflict, counsel for the government, with the agreement of counsel for Mr. Jimenez

STIPULATION AND [PROPOSED] ORDER
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1 and the assigned Probation Officer, request that the Court continue sentencing in this matter until
2 Wednesday, September 12, 2018.

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4 Dated: June 6, 2018

Respectfully submitted

5 ALEX G. TSE
6 Acting United States Attorney

7 /s/
8 CHRISTIAAN H. HIGHSMITH
9 Assistant United States Attorney

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11 Dated: June 6, 2018

12 /s/*
13 SARA ZALKIN
14 Attorney for Defendant Daniel Jimenez

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16 *signed by counsel for the United States
17 with permission of Attorney Zalkin

18
19 **~~[PROPOSED]~~ ORDER**

20 For good cause, and pursuant to the stipulation of the government and defendant Daniel Jimenez,
21 and the agreement of the United States Probation Officer, IT IS HEREBY ORDERED that the
22 sentencing date currently scheduled for June 27, 2018 for defendant Daniel Jimenez is continued to
23 September 12, 2018.

24 IT IS SO ORDERED.

25 Dated: 6/14/2018

26 
27 HONORABLE JAMES DONATO
28 UNITED STATES DISTRICT JUDGE