

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-15-00547-2 JD |
| |) | |
| Plaintiff, |) | STIPULATION AND [PROPOSED] ORDER |
| |) | CONTINUING SENTENCING DATE |
| v. |) | |
| |) | |
| MANUEL GONZALEZ CHAVEZ, |) | |
| |) | |
| Defendant. |) | |

STIPULATION

The United States of America and defendant Manuel Gonzalez Chavez, 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 Gonzalez Chavez is currently scheduled for sentencing on August 8, 2018.
2. Defendant Gonzalez Chavez is facing a mandatory minimum sentence of 25 years and one day. The government is expected to recommend a sentence of greater than 25 years.
3. Defense counsel needs additional time to interview witnesses, obtain medical information and other records that are crucial to the sentencing hearing, and to present those materials to the

STIPULATION AND ~~[PROPOSED]~~ ORDER
CR-15-00547-2 JD

1 Probation Officer prior to the Probation Officer filing the final Presentence Investigation Report.

- 2 4. Based on the foregoing, the parties request that the Court vacate the current sentencing date and
3 request that the Court continue sentencing in this matter until Wednesday, September 12, 2018.

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5 Dated: July 13, 2018

Respectfully submitted

6 ALEX G. TSE
7 Acting United States Attorney

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

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12 Dated: July 13, 2018

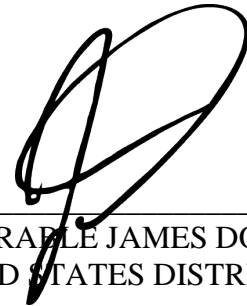
/s/
13 ALAN A. DRESSLER
Attorney for Defendant
14 Manuel Gonzalez Chavez

~~[PROPOSED]~~ ORDER

For good cause, and pursuant to the stipulation of the government and defendant Manuel Gonzalez Chavez, and the agreement of the United States Probation Officer, IT IS HEREBY ORDERED that the sentencing date currently scheduled for August 8, 2018 for defendant Manuel Gonzalez Chavez is continued to September 12, 2018.

IT IS SO ORDERED.

Dated: July 23, 2018



HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE