

HEATHER E. WILLIAMS, Bar #122664
Federal Defender
JANET BATEMAN, Bar #241210
MEGAN T. HOPKINS, Bar #294141
Assistant Federal Defenders
Designated Counsel for Service
2300 Tulare Street, Suite 330
Fresno, California 93721-2226
Telephone: (559) 487-5561

Counsel for Defendant
MARCELINO FLORES-MARTINEZ

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 1:14-cr-00216-AWI-BAM
)
Plaintiff,) STIPULATION AND ORDER TO VACATE
) STATUS CONFERENCE HEARING AND SET
vs.) FOR CHANGE OF PLEA HEARING
)
MARCELINO FLORES-MARTINEZ,)
) DATE: March 16, 2015
) TIME: 10:00 a.m.
Defendant.) JUDGE: Hon. Anthony W. Ishii
)

IT IS HEREBY STIPULATED by and between the parties through their respective counsel, Assistant United States Attorney, MIA GIACOMAZZI, counsel for plaintiff, Assistant Federal Defenders, JANET BATEMAN and MEGAN T. HOPKINS, counsel for defendant MARCELINO FLORES-MARTINEZ, that the hearing currently set for March 9, 2015, **may be vacated and the matter reset for a change of plea hearing March 16, 2015 at 10:00 a.m. before District Judge Anthony W. Ishii.**

The parties have reached an agreement. The defense has submitted a signed plea agreement, which the Assistant United States Attorney will file shortly.

The parties agree that the time until the change of plea hearing shall be excluded in the interests of justice, including but not limited to, the need for the period of time set forth herein for effective defense preparation pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(ii), (iv).

1 BENJAMIN B. WAGNER
2 United States Attorney

3 Dated: March 6, 2015

4 /s/ *Mia Giacomazzi*
5 MIA GIACOMAZZI
6 Assistant United States Attorney
7 Attorney for Plaintiff

8 HEATHER E. WILLIAMS
9 Federal Defender

10 Dated: March 6, 2015

11 /s/ *JANET BATEMAN*
12 JANET BATEMAN
13 MEGAN T. HOPKINS
14 Assistant Federal Defenders
15 Attorneys for Defendant
16 MARCELINO FLORES-MARTINEZ

17 **O R D E R**

18 **IT IS SO ORDERED.** For the reasons set forth above, the continuance requested is
19 granted for good cause. The Court finds that the interest of justice outweighs the interests of the
20 public and the defendant in a speedy trial, and time is excluded pursuant to 18 U.S.C. §§ 3161
21 (h)(7)(A) and (B)(ii), (iv).

22 IT IS SO ORDERED.

23 Dated: March 6, 2015

24 
25 SENIOR DISTRICT JUDGE