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United States of America

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JORGE CALDERON-CAMPOS, ALBERTO GOMEZ-SANTIAGO, BYRON ADILIO ALFARO-SANDOVAL, FRANCISCO JAVIER TORRES MORA, JOSE ANGEL BELTRAN-CHAIDEZ, AND MARK GARCIA, Defendants.	CASE NO. 1:22-CR-00131-DAD-BAM STIPULATION REGARDING EXCLUDABLE TIME PERIODS UNDER SPEEDY TRIAL ACT; AND ORDER DATE: August 10, 2022 TIME: 1:00 p.m. COURT: Hon. Magistrate Judge Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on August 10, 2022.

2. By this stipulation, the parties move to continue the status conference until November 9, 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between August 10, 2022, and November 9, 2022.

3. The parties agree and stipulate, and request that the Court find the following:

a) Initial discovery was provided to defendants on or about May 20, 2022, consisting of 1,082 Bates-stamped items including wiretap data, reports of investigation, photographs,

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recordings of post-arrest interviews, and a summary of defendant's criminal history.

b) Counsel for defendants desire additional time to review discovery, consult with their clients, conduct investigation and research related to the charges, and to otherwise prepare for trial.

c) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 10, 2022 to November 9, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv), because it results from a continuance granted by the Court at the defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 1, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ CHRISTOPHER D. BAKER
CHRISTOPHER D. BAKER
Assistant United States Attorney

/s/ DAVID A. TORRES
DAVID A. TORRES
Counsel for defendant Jorge Calderon-Campos

/s/ MICHAEL E. MITCHELL
MICHAEL E. MITCHELL
Counsel for defendant Alberto Gomez-Santiago

/s/ FATIMA RODRIGUEZ
FATIMA RODRIGUEZ
Counsel for defendant Byron Adilio Alfaro-Sandoval

/s/ PATRICK S. AGUIRRE
PATRICK A. AGUIRRE
Counsel for defendant Francisco Javier Torres-Mora

/s/ ALEKXIA L. TORRES STALLINGS
ALEKXIA L. TORRES STALLINGS
Counsel for defendant Jose Angel Beltran-Chaidez

/s/ MARK A. BROUGHTON
MARK A. BROUGHTON
Counsel for defendant Mark Garcia

ORDER

IT IS SO ORDERED that the status conference is continued from August 10, 2022, to **November 9, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **August 2, 2022**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE