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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-JLT-SKO STIPULATION REGARDING EXCLUDABLE TIME PERIODS UNDER SPEEDY TRIAL ACT; ORDER DATE: June 7, 2023 TIME: 1:00 p.m. COURT: Hon. Magistrate Judge Sheila K. Oberto
UNITED STATES OF AMERICA, Plaintiff, v. JORGE CALDERON-CAMPOS, Defendant.	CASE NO. 1:22-CR-00130-JLT-SKO STIPULATION REGARDING EXCLUDABLE TIME PERIODS UNDER SPEEDY TRIAL ACT; ORDER DATE: June 7, 2023 TIME: 1:00 p.m. COURT: Hon. Magistrate Judge Sheila K. Oberto

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, these matters were scheduled for a status conference on June 7, 2023, before U.S. Magistrate Judge Sheila K. Oberto.

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2. On September 30, 2022, U.S. District Judge Jennifer L. Thurston found that these matters are related.

3. By this stipulation, the parties move to continue the status conference until September 20, 2023, before U.S. Magistrate Sheila K. Oberto, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between June 7, 2023, and September 20, 2023.

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

a) 1,655 pages of Bates-stamped material has been provided to the defense in this matter. This material consists of wiretap intercepts and data, reports of investigation, photographs, recordings of post-arrest interviews, and defendant's criminal histories.

b) Plea offers have been made to all of the defendants.

c) There is a pending conflict of interest motion filed by the government as to defendants Calderon-Campos and Beltran-Chaidez, to which the defense intends to submit a response. The parties also intend to set a hearing to address the potential conflict in advance of the status conference date.

d) Counsel for defendants desire additional time to review discovery, consult with their clients, conduct investigation and research related to the charges, consider plea offers, engage in plea negotiations, and to otherwise prepare for trial.

e) 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.

f) 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.

g) 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 June 7, 2023 to September 20, 2023, 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.

5. 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: May 25, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
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.

DATED: 5/30/2023

Sheila K. Oberto
THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE