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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JORGE CALDERON-CAMPOS, BYRON ADILIO ALFARO-SANDOVAL, JOSE ANGEL BELTRAN-CHAIDEZ, ANTONIO 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: December 6, 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: December 6, 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 December 6, 2023, before U.S. Magistrate Judge Sheila K. Oberto. On September 7, 2023, the Court also directed the

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parties to set a trial date. The courtroom deputy later clarified by email to the parties that the Court would allow a stipulation to continue the status conference, since defendant Antonio Beltran-Chaidez and his counsel, Daniel Harralson, made their initial appearance in this case in July 2023 and Mr. Harralson has not had sufficient time to review the voluminous discovery and the government's July 27, 2023, plea offer with his client.

2. In addition, on September 7, 2023, Monica Bermudez entered her appearance as counsel for defendant Jose Angel Beltran-Chaidez. His former attorney withdrew following the government's motion of a potential conflict of interest based on the joint representation of Beltran-Chaidez and Defendant Calderon-Campos by two members of the same law firm.

3. In light of Ms. Bermudez's and Mr. Harralson's need to review discovery and have meaningful discussions with their clients regarding the government's plea offers to them, by this stipulation, the parties request an additional continuance of the status conference. It is requested that the status conference currently set for December 6, 2023, be continued to May 15, 2024, 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 December 6, 2023, and May 15, 2024.

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

a) 1,656 pages of Bates-stamped material has been provided to the defense in this matter. This material consists primarily of wiretap intercepts and data, reports of investigation, photographs, recordings of post-arrest interviews, and defendants' criminal histories.

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

c) 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.

d) 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.

e) 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.

f) 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 December 6, 2023 to May 15, 2024, 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: November 17, 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/ FATIMA RODRIGUEZ
FATIMA RODRIGUEZ
Counsel for defendant Byron Adilio Alfaro-Sandoval

/s/ MONICA BERMUDEZ
MONICA BERMUDEZ
Counsel for defendant Jose Angel Beltran-Chaidez

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

/s/ DANIEL L. HARRALSON
DANIEL L. HARRALSON
Counsel for defendant Antonio Beltran-Chaidez

ORDER

IT IS SO ORDERED.

DATED: 11/22/2023

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE