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Attorney for the Defendant
Jose Angel Beltran Chiadez

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JOSE ANGEL BELTRAN CHIADEZ, Defendants.	CASE NO. 1:22-cr-00131-JLT STIPULATION TO CONTINUE CHANGE OF PLEA HEARING; FINDINGS AND ORDER DATE: May 13, 2024 TIME: 9:00 a.m. JUDGE: Hon. Jennifer L. Thurston

STIPULATION

COMES NOW, Defendant, Jose Angel Beltran Chiadez, by and through his attorney of record, Monica L. Bermudez and The United States of America, by and through its counsel of record hereby stipulate as follows:

1. By previous order, this matter was set for change of plea on February 20, 2024.

2. By this stipulation, defendant now moves to reset the change of plea hearing to **May 13, 2024 at 10:00 a.m.** before the Honorable Jennifer L. Thurston, and to exclude time between the date of this stipulation and May 13, 2024 under 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv). The government joins in this request.

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

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a. Counsel for defendant requires more time to discuss the change of plea with her client.

b. The government does not object to, and agrees with, the requested continuance.

c. 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 defendant 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 the date of this stipulation to May 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at 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.

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

IT IS SO STIPULATED.

DATED: February 14, 2024

/s/ Monica L. Bermudez
MONICA L. BERMUDEZ
Counsel for Defendant
JOSE ANGEL BELTRAN CHIADEZ

DATED: February 14, 2024

/s/Karen Escobar
KAREN ESCOBAR
Assistant United States Attorney

O R D E R

IT IS SO FOUND. The time period of the date of this order to May 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at 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 defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **February 14, 2024**

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE