Robert M. Holley (SBN 50769)
Attorney at law
State Bar No. 50769
331 J Street, Suite #200
Sacramento, California 95814
Telephone: (916) 443-2213

Attorney for Defendant David Perez Ramirez

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	**NO. CRS 07-248-15 WBS**
Plaintiff,	**STIPULATION AND [~~PROPOSED~~] ORDER CONTINUING SENTENCING DATE**
v.	
DAVID PEREZ RAMIREZ,	
Defendant.	

REASONS FOR THE REQUEST TO CONTINUE

The final presentence report has been received by both parties and contains additional information to which the defense has not been privy and which needs to be reviewed before formal objections can be adequately prepared and filed. Additionally, on May 17, 2011, the government sent to the probation officer a letter entitled "Informal Objection to Revised PSR for DAVID RAMIREZ." The letter contains references to JENCKS material which has not yet been provided to the defense. The issues presented therein appear to be important and the defense is going to need the additional time requested to determine the strength and veracity of the evidence to which it is not yet privy and to prepare the appropriate response for the Court.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

STIPULATION

It is hereby stipulated by and between the parties hereto, through their respective undersigned counsel, that the sentencing hearing date presently scheduled for May 31, 2011 at 8:30 a.m. be continued to Monday, June 27, 2011 at 8:30 a.m. before the Honorable William B. Shubb, United States District Judge.

The parties hereby stipulate to and request the following revised schedule concerning the presentence investigation report:

Additional informal objections to the revised Presentence Report due to probation officer and counsel . . . . May 30, 2011

Final and possibly further revised Presentence Report disclosed . . . . . June 6, 2011

Formal Objections to Presentence Report due and filed . . . . . .June 13, 2011

Hearing date on sentencing . . . . . June 27, 2011

Dated: May 20, 2011

/S/ Robert M. Holley

Robert M. Holley
Counsel for Mr. Ramirez

/S/ Jason Hitt

Mr. Jason Hitt
Counsel for the United States

ORDER

Good cause appearing, the above-stated calendaring change is so ordered.

Dated: May 24, 2011

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE