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Attorney for Defendant
DAVID PEREZ RAMIREZ

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. DAVID PEREZ RAMIREZ, Defendant.	2:07-CR-00248-15 WBS **UNOPPOSED REQUEST TO EXTEND DEADLINES AND MODIFY BRIEFING SCHEDULE; ~~[PROPOSED]~~ ORDER**

Pursuant to Local Rule 144, undersigned counsel, Erin J. Radekin, respectfully requests the briefing schedule relating to defendant's motion to reduce sentence pursuant to 18 U.S.C. § 3582(c)(2) be modified to reflect the following deadlines:

Amended motion to reduce sentence	**November 13, 2015**
Government's opposition	**November 27, 2015**
Defendant's reply, if any	**December 4, 2015**

The reason for this request is that undersigned counsel needs additional time to obtain and review records relating to the defendant's post-sentencing conduct and to communicate with Mr. Ramirez, which must be done by writing. Further, counsel has surgery scheduled on October 16, 2015 due to an unexpected medical issue, and expects to be recovering therefrom through October 28, 2015.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Assistant United States Attorney Jason Hitt has indicated he has no objection to the proposed extension.

Dated: October 14, 2015

Respectfully submitted,

/s/ Erin J. Radekin
ERIN J. RADEKIN
Attorney for Defendant
LUCIANO MERCADO

ORDER

Pursuant to the unopposed request, and good cause appearing therefor, it is hereby ordered that the briefing schedule relating to defendant's motion pursuant to § 3582(c)(2) be revised to reflect the following deadlines:

Amended motion to reduce sentence	**November 13, 2015**
Government's opposition	**November 27, 2015**
Defendant's reply, if any	**December 4, 2015**

Dated: October 15, 2015

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE