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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 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	**December 4, 2015**
Government's opposition	**December 18, 2015**
Defendant's reply, if any	**December 28, 2015**

The reason for this request is that undersigned counsel needs additional time to communicate further with Mr. Ramirez, who is presently serving his sentence in prison. Counsel has obtained all necessary records and completed all review of records and research in connection with Mr. Ramirez's motion, and has communicated with Mr. Ramirez and his wife regarding his motion. It is necessary, however, that counsel communicate

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with Mr. Ramirez further, which must be done via writing, before filing an amended motion.

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

Dated: November 12, 2015

Respectfully submitted,

/s/ Erin J. Radekin
ERIN J. RADEKIN
Attorney for Defendant
DAVID PEREZ RAMIREZ

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	**December 4, 2015**
Government's opposition	**December 18, 2015**
Defendant's reply, if any	**December 28, 2015**

Dated: November 13, 2015

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE