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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 STIPULATION AND [~~PROPOSED~~] ORDER TO MODIFY REPLY BRIEF DUE DATE

On November 10, 2016, Mr. Ramirez filed an amended motion to reduce sentence pursuant to 18 U.S.C. § 3582(c)(2). CR 1458. On December 1, 2016, the government filed its opposition to the amended motion. CR 1471. Pursuant to this Court's order on October 14, 2016, the reply brief is due on December 9, 2016. CR 1447.

Ms. Radekin intends to file a reply; however, she has ordered and is waiting for disciplinary records to investigate the disciplinary violation to which the government refers, and argues is a ground for denial of a reduction, in its opposition.

Therefore, the parties respectfully stipulate and request that the Court vacate the current reply brief due date and set a new due date for the reply on January 20, 2017. Ms. Radekin has conferred with Assistant United

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States Attorney Jason Hitt, and he has indicated he has no opposition to this request and authorizes Ms. Radekin to sign this stipulation on his behalf.

Dated: December 9, 2016

PHILLIP A. TALBERT
Acting United States Attorney

By: /s/ Jason Hitt
JASON HITT
Assistant United States Attorney

Dated: December 9, 2016

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

ORDER

Pursuant to the parties' stipulation, and good cause appearing, it is hereby ordered that the reply brief due date be modified to January 20, 2017.

Dated: December 9, 2016

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE