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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 BRIEFING SCHEDULE**

On November 10, 2016, Mr. Ramirez filed his amended motion to reduce sentence pursuant to 18 U.S.C. § 3582(c)(2). CR 1458. The government filed its opposition on December 1, 2016. CR 1471. Pursuant to this Court's order signed on February 22, 2017, the date due for the reply brief was moved to February 21, 2017. CR 1500.

Ms. Radekin intends to file a reply; however, she is still 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. Several attempts by the defense to obtain the records from the prison have failed. Ms. Radekin has asked Assistant United States Attorney Jason Hitt to obtain the records; however, he has not yet received them. Thus, Ms. Radekin is still waiting for the records.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Accordingly, the parties stipulate and request that the date due for the reply brief be modified to April 24, 2017. Assistant United States Attorney Jason Hitt has indicated he has no objection to the modification of the reply brief due date and has authorized Ms. Radekin to sign this stipulation on his behalf.

IT IS SO STIPULATED.

Dated: March 23, 2017

PHILLIP A. TALBERT
Acting United States Attorney

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

Dated: March 23, 2017

/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 April 24, 2017.

Dated: March 24, 2017

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE