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Attorney for Defendant
BISMARK MARTIN OCAMPO

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. **BISMARK MARTIN OCAMPO**, Defendant.	2:07-CR-00248 WBS **STIPULATION AND ORDER TO MODIFY BRIEFING SCHEDULE**

On March 24, 2017, this Court ordered the deadline for the parties to file a stipulation regarding a potential motion pursuant to Federal Rule of Criminal procedure 35 and a possible Amendment 782 reduction to be extended to April 24, 2017. CR 1514.

There have been a number of extensions of the deadline to file this stipulation while the government was awaiting records from the Northern District of California relevant to a possible reduction of Mr. Ocampo's sentence under Rule 35 and/or Amendment 782. The government recently received the records and needs additional time to review them, assess whether to grant a Rule 35 and/or Amendment 782 reduction, and provide a draft of a stipulation to the defense. Ms. Radekin will then need time to review the stipulation and communicate with her client. The parties contemplate these

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tasks will take approximately six weeks. Ms. Radekin has no opposition to this extension.

Accordingly, the parties stipulate and request that the date due for the filing of a stipulation regarding a Rule 35 and/or Amendment 782 reduction be extended to June 12, 2017. Assistant United States Attorney Jason Hitt has authorized Ms. Radekin to sign this stipulation on his behalf.

The parties respectfully request the Court adopt the above stipulation.

Dated: April 28, 2017

PHILLIP A. TALBERT
United States Attorney

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

Dated: April 28, 2017

/s/ Erin J. Radekin
ERIN J. RADEKIN
Attorney for Defendant
BISMARK MARTIN OCAMPO

ORDER

Pursuant to the parties' stipulation, and good cause appearing, it is hereby ordered that the current deadline for the filing of a stipulation regarding a Rule 35 and/or Amendment 782 reduction, April 24, 2017 be VACATED, and that the deadline for filing of such stipulation be extended to June 12, 2017.

Dated: May 1, 2017

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE