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Attorney for Defendant
BISMARK MARTIN OCAMPO

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. BISMARK MARTIN OCAMPO, Defendant,	No. CR-S-07-248 WBS STIPULATION AND ORDER CONTINUING STATUS CONFERENCE

It is hereby stipulated and agreed to between Bismark Martin Ocampo through counsel Dwight M. Samuel and United States of America, by and through, Assistant United States Attorney, that the status conference presently set for Monday, April 28, 2008 at 10:30 a.m. be vacated and rescheduled for a status conference on Monday, June 30, 2008, at 10:30 a.m.

Counsel for Defendant Ocampo has consulted with his client and advises the court and AUSA that Mr. Ocampo does not want to go to trial on the jury trial date as presently set. Counsel for Ocampo requests the court permit this statement to be on the record at the next scheduled appearance of June 30, 2008, or if the court deems an earlier declaration is necessary counsel will lodged that declaration with the court.

As further justification for continuance, counsel for defendant calendered the April

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28,2008 date properly but failed to note the requirement of his appearance. Due to counsel's failure to note the court's order, likely due to counsel dealing with a death in the family, counsel rescheduled an investigative trip, which had previously been cancelled, to Texas and Florida.. The investigation in the case of U.S. v Mann 07-229 also involves participation of Federal Public Defender, Matt Bockman, and two investigators, the trip is scheduled to begin Saturday, April 26 through Wednesday, April 30, 2008.

It is further stipulated that the period from April 28, 2008, through and including June 30, 2008 be excluded in computing the time within which trial must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T-4 for continuity and preparation of counsel.

Respectfully submitted,

Dated: April 24, 2008

/s/ Dwight M. Samuel
DWIGHT M. SAMUEL
Attorney for Defendant, Bismark Ocampo

Dated: April 24, 2008

/s/Jason Hitt
JASON HITT
Assistant United States Attorney

IT IS SO ORDERED.

Dated: April 29, 2008

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE