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Attorney for Defendant
GABRIEL CARACHEO

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. GABRIEL CARACHEO, et. al. Defendant.	Case No. CR S 07-248 WBS **STIPULATION AND [~~PROPOSED~~] ORDER TO CONTINUE STATUS HEARING**

It is hereby stipulated and agreed to between plaintiff, UNITED STATES OF AMERICA, through its counsel of record, Jason Hitt, Assistant United States Attorney, and defendant, GABRIEL CARACHEO, through his counsel of record, Joseph J. Wiseman, and defendant, LEO TORRES, through his counsel of record, Robert J. Peters, that the status conference scheduled for April 28, at 10:00 a.m., be rescheduled to June 30, 2008, 10:00 a.m.

The parties further stipulate and agree that an additional continuance is appropriate in this case and request that the time beginning April 28, 2008 and extending through June 30, 2008, be ordered excluded from the calculation of time under the Speedy Trial Act. The ends of justice will be served by the Court excluding such time, so that counsel for the Defendants may have reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(8)(B)(iv).

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Specifically, defendants CARACHEO and TORRES have decided not to seek an early trial date at this time, which obviates the need for the court to hold a trial setting conference for these defendants. The parties submit that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

Dated: May 5, 2008

Respectfully submitted,

JOSEPH J. WISEMAN, P. C.

By: /s/ Joseph J. Wiseman

JOSEPH J. WISEMAN
Attorney for Defendant
GABRIEL CARACHEO

Dated: May 5, 2008

ROBERT J. PETERS

By: /s/ Robert J. Peters

ROBERT J. PETERS
Attorney for Defendant
LEO TORRES

Dated: May 5, 2008

McGREGOR W. SCOTT

United States Attorney

By: /s/ Jason Hitt

JASOPN HITT, AUSA
Attorney for Plaintiff
UNITED STATES OF AMERICA

ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the status hearing in the above-captioned case be continued to JUNE 30, 2008, at 10:00 a.m.

Dated: May 5, 2008

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE