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5 Attorney for Defendant
JULIA SAECHAO
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,) CR.S. 10-0168-JAM
)
12 Plaintiff,) STIPULATION AND ORDER
) TO EXTEND TIME FOR STATUS
13 v.) CONFERENCE AND EXCLUDE TIME
)
14 TAC CHE, et al.,) DATE: February 28, 2012
) Time: 9:30 a.m.
15 Defendants.) Judge: John A. Mendez
)
16

17 Defendant JULIA SAECHAO, by and through her counsel, DENNIS
18 S. WAKS, Supervising Assistant Federal Defender, TAC CHE by and
19 through his counsel, DONALD MASUDA and KENNY GIFFARD, BOB AN, by
20 and through his attorney, RONALD PETERS, CUONG HOANG, by and
21 through his attorney, SCOTT CAMERON, LIEN TROUNG, by and through
22 his counsel, DINA SANTOS, KENNY LU, by and through his counsel,
23 DAVID FISCHER, VINH HOANG, by and through his counsel, GILBERT
24 ROQUE and the United States Government, by and through its
25 counsel, TODD LERAS, Assistant United States Attorney, hereby
26 stipulate that the status conference set for January 17, 2012, be
27 rescheduled for a status conference on Tuesday, February 28,
28 2012, at 9:30 a.m.

1 This continuance is being requested because defense counsel
2 needs additional time to review discovery, talk to witnesses and
3 pursue investigation.

4 Furthermore, the party's have been diligently attempting to
5 reach a negotiated disposition in this case and we believe that
6 the additional time will aid us in that attempt.

7 Speedy trial time is to be excluded from the date of this
8 order through the date of the status conference set for February
9 28, 2012, pursuant to 18 U.S.C. § 3161 (h) (7) (B) (iv), [reasonable
10 time to prepare] (Local Code T4).

11 The Court finds that the ends of justice to be served by
12 granting a continuance outweigh the best interest of the public
13 and the defendants in a speedy trial.

14 DATED: January 10, 2012

Respectfully Submitted,

15 DANIEL J. BRODERICK
16 Federal Defender

17 /s/ Dennis S. Waks
18 Supervising Assistant
19 Federal Defender
20 Attorney for Defendant
21 JULIA SAECHAO

22 /s/ Dennis S. Waks for
23 DONALD MASUDA
24 Attorney for TAC CHE

25 /s/ Dennis S. Waks for
26 KENNY GIFFARD
27 Attorney for TAC CHE

28 /s/ Dennis S. Waks for
RONALD PETERS
Attorney for BOB AN

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/s/ Dennis S. Waks for
SCOTT CAMERON
Attorney for CUONG HOANG

/s/ Dennis S. Waks for
DINA SANTOS
Attorney for LIEN TRUONG

/s/ Dennis S. Waks for
DAVID FISCHER
Attorney for KENNY LU

/s/ Dennis S. Waks for
GILBERT ROQUE
Attorney for VINH HOANG

DATED: January 10, 2012

BENJAMIN B. WAGNER
United States Attorney

/s/ Dennis S. Waks for
TODD LERAS
Assistant U.S. Attorney

SO ORDERED.

Dated: 1/11/2012

/s/ John A. Mendez
JOHN A. MENDEZ
United States District Court