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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA ) CR. NO. 2:12-cr-00387 MCE  
12 )  
Plaintiff, )  
13 v. ) STIPULATION AND ORDER  
TO CONTINUE STATUS CONFERENCE  
14 ILIE ZDRAGAT, )  
15 Defendant. )  
16 \_\_\_\_\_ )

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18 The United States of America, through Assistant United States  
19 Attorney Todd D. Leras, and the defendant Ilie Zdragat, through his  
20 counsel, Kenny N. Giffard, stipulate and agree to continue the  
21 status conference, scheduled for January 24, 2013, to March 28,  
22 2013, at 9:00 a.m.

23 This case involves allegations that defendant participated in a  
24 scheme to file false tax returns. The government has recently  
25 released to defense counsel a significant number of audiotapes  
26 related to the investigation of this matter.

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1 Defense counsel needs time to review the tapes, arrange for  
2 translation of any tapes which are not in English, and to conduct  
3 follow-up investigation related to matters discussed in the tapes.  
4 The parties therefore request that the current status conference be  
5 continued and that time be excluded pursuant to 18 U.S.C. §  
6 3161(h)(7)(B)(iv) - Local Code T-4 (attorney preparation and  
7 continuity of counsel). The parties agree to an exclusion of time  
8 for the reasons stated above up to and including March 28, 2013.

9 Kenny Giffard has authorized Assistant U.S. Attorney Todd Leras  
10 to sign this stipulation on his behalf.

11 Respectfully submitted,

12 BENJAMIN B. WAGNER  
13 United States Attorney

14 DATED: January 22, 2013

By: /s/ Todd D. Leras  
TODD D. LERAS  
Assistant U.S. Attorney

17 DATED: January 22, 2013

By: /s/ Todd D. Leras for  
KENNY N. GIFFARD  
Attorney for Defendant

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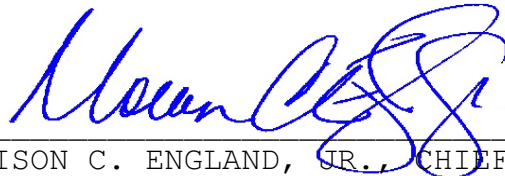
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ORDER

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2 Good cause having been shown, it is hereby ordered that the  
3 status conference currently scheduled for January 24, 2013, is  
4 continued to March 28, 2013, at 9:00 a.m. Based on the  
5 representation of the parties, the Court finds that the ends of  
6 justice served by granting the continuance outweigh the best  
7 interest of the public and the defendant in a speedy trial. Time  
8 under the Speedy Trial Act shall be excluded under 18 U.S.C.  
9 § 3161(h) (7) (B) (4) and Local Code T-4 up to and including March 28,  
10 2013.

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12 Dated: January 23, 2013



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14 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
15 UNITED STATES DISTRICT JUDGE  
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