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Attorney for Defendant
LILLIAN MARQUEZ

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

UNITED STATES OF AMERICA,)	Case No. CR.S. 13-378-JAM
)	
Plaintiff,)	STIPULATION AND ORDER RE;
)	CONTINUANCE OF STATUS
V.)	CONFERENCE AND FINDINGS OF
)	EXCLUDABLE TIME
LILLIAN MARQUEZ)	
aka Lillian Yamileth Guevara, and)	Date: April 15, 2014
)	Time: 9:45 a.m.
MICHAEL KEATTS,)	Judge: Hon. JOHN A. MENDEZ
)	
Defendants.)	

It is hereby stipulated and agreed to by the United States of America through PHILIP A. FERRARI, Assistant United States Attorney, LILLIAN MARQUEZ, by and through her counsel, DENNIS S. WAKS, and MICHAEL KEATTS, by and through his counsel, HECTOR A. CAVAZOS, JR., that the status conference set for February 4, 2014, be continued to a status conference on Tuesday, April 15, 2014, at 9:45 a.m. This continuance is being requested because defense counsel needs additional time to prepare, to review discovery, and to interview witnesses. Counsel has recently received over 17,000 pages of discovery and will need additional time to read the discovery and go over it with our clients.

Furthermore, the parties stipulate and agree that the interest of justice served by granting this continuance outweigh the best interest of the public and the defendants in a speedy trial.

(18 U.S.C. §3161(h)(7)(A)). Speedy trial time is to be excluded from the date of this order through the date of the status conference set for April 15, 2014, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) [reasonable time to prepare] (Local Code T4).

DATED: January 30, 2014

Respectfully submitted,

/s/ Dennis S. Waks

DENNIS S. WAKS
Attorney for Defendant
LILLIAN MARQUEZ

DATED: January 30, 2014

/s/ Dennis S. Waks for

HECTOR A. CAVAZOS, JR.
Attorney for Defendant
MICHAEL KEATTS

DATED; January 30, 2014

BENJAMIN B. WAGNER
United States Attorney

/s/ Dennis S. Waks for

PHILIP A. FERRARI
Assistant U.S. Attorney

ORDER

Based on the stipulation of the parties and good cause appearing, the Court hereby finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court specifically finds that the ends of justice served by the granting of such continuance outweigh the interests of the public and the defendants in a speedy trial. Based on these findings and pursuant to the stipulation of the parties, the Court hereby adopts the stipulation of the parties in its

1 entirety as its order. Time is excluded from computation of time within which the trial of this
2 matter must be commenced beginning from the date of the stipulation through and including
3 April 15, 2014, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for defense
4 counsel to prepare] and Local Code T4. A new status conference date is hereby set for April 15,
5 2014, at 9:45 a.m.
6

7 DATED: 1/30/2014

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