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

9

10 UNITED STATES OF AMERICA,) Case No. CR.S. 13-378-JAM
11 Plaintiff,) STIPULATION AND ORDER RE;
12 V.) CONTINUANCE OF STATUS
13 LILLIAN MARQUEZ) CONFERENCE AND FINDINGS OF
aka Lillian Yamileth Guevara, and) EXCLUDABLE TIME
14 MICHAEL KEATTS,) Date: April 15, 2014
Time: 9:45 a.m.
15) Judge: Hon. JOHN A. MENDEZ
16 Defendants.
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18 It is hereby stipulated and agreed to by the United States of America through PHILIP A.
19 FERRARI, Assistant United States Attorney, LILLIAN MARQUEZ, by and through her
20 counsel, DENNIS S. WAKS, and MICHAEL KEATTS, by and through his counsel, HECTOR
21 A. CAVAZOS, JR., that the status conference set for February 4, 2014, be continued to a status
22 conference on Tuesday, April 15, 2014, at 9:45 a.m. This continuance is being requested
23 because defense counsel needs additional time to prepare, to review discovery, and to interview
24 witnesses. Counsel has recently received over 17,000 pages of discovery and will need
25 additional time to read the discovery and go over it with our clients.

26
27 Furthermore, the parties stipulate and agree that the interest of justice served by granting
28 this continuance outweigh the best interest of the public and the defendants in a speedy trial.

1 (18 U.S.C. §3161(h)(7)(A)). Speedy trial time is to be excluded from the date of this order
2 through the date of the status conference set for April 15, 2014, pursuant to 18 U.S.C. § 3161
3 (h)(7)(B)(iv) [reasonable time to prepare] (Local Code T4).

4 DATED: January 30, 2014

5 Respectfully submitted,

6 /s/ Dennis S. Waks

7 DENNIS S. WAKS
8 Attorney for Defendant
9 LILLIAN MARQUEZ

10 DATED: January 30, 2014

11 /s/ Dennis S. Waks for

12 HECTOR A. CAVAZOS, JR.
13 Attorney for Defendant
14 MICHAEL KEATTS

15 DATED: January 30, 2014

16 BENJAMIN B. WAGNER
17 United States Attorney

18 /s/ Dennis S. Waks for

19 PHILIP A. FERRARI
20 Assistant U.S. Attorney

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22 **O R D E R**

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

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

DATED: 1/30/2014

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