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JULIO NEVAREZ-ERUNEZ

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

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| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>v.<br><br>JULIO NEVAREZ-ERUNEZ,<br><br>Defendant. | Case No. 2:22-cr-210 DJC<br><br>**STIPULATION AND [~~PROPOSED~~] ORDER TO MODIFY CONDITIONS OF PRETRIAL RELEASE**<br><br>Judge: Hon. Allison Claire |

**IT IS HEREBY STIPULATED**, by and between the parties, through their respective counsel, Assistant United State Attorney Emily Sauvageau, counsel for the United States, and Assistant Federal Defender Meghan D. McLoughlin, counsel for Defendant Julio Nevarez-Erunez, that Mr. Nevarez-Erunez's conditions of release be temporarily modified so that he can attend a work trip to Brewster, Washington for approximately 8–10 days, beginning September 25, 2023.

Mr. Nevarez-Erunez was released from custody onto pretrial supervision on April 26, 2023. ECF No. 70. He is currently residing and working in Oregon. The conditions of his release require him to participate in location monitoring and abide by a daily curfew to his residence from 8:00 p.m. to 6:00 a.m. *See* ECF No 75 at ¶¶12, 13. Since his release, for nearly five months,

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Mr. Nevarez-Erunez has complied with all conditions, including his location monitoring and curfew, and is currently employed.

Mr. Nevarez-Erunez now seeks permission to leave Oregon and travel to Washington for a work project, and remain on site for approximately 8–10 days. During that time, because he is not in his home, he will not be subject to location monitoring and he will not return to his residence by his curfew time each night. As a result, he respectfully requests that his conditions be modified to allow him to attend the work trip by temporarily suspending his location monitoring and curfew requirements until he returns from the trip, or by October 6, 2023, whichever is earlier. Given his continued compliance for over 90 days and his current employment, Pretrial Services does not oppose this modification. Likewise, the government does not oppose the temporary modification described herein.

In light of this, the parties request that Mr. Nevarez-Erunez's conditions of release be modified, and specifically that Conditions 12 and 13 be temporarily suspended beginning September 25, 2023 until October 6, 2023, or until Mr. Nevarez-Erunez returns from his trip, whichever is earlier. All other previously imposed terms and conditions will remain in full force and effect.

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Dated: September 19, 2023

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Public Defender

*/s/ Meghan D, McLoughlin*
MEGHAN D. McLOUGHLIN
Assistant Federal Defender
Attorneys for Defendant
JULIO CESAR NEVAREZ-ERUNEZ

Dated: September 19, 2023

PHILLIP A. TALBERT
UNITED STATES ATTORNEY

*/s/ Emily G. Sauvageau*
EMILY G. SAUVAGEAU
Assistant United States Attorney

**[~~PROPOSED~~] FINDINGS AND ORDER**

Pursuant to the parties' stipulation, and good cause appearing, the Court hereby modifies the Order Setting Special Conditions of Release, ECF No. 75, to allow Mr. Nevarez-Erunez to attend a work trip out of state, for approximately 8–10 days, beginning on September 25, 2023. Special Conditions 12 and 13 will be temporarily lifted from September 25, 2023 until October 6, 2023, or until Mr. Nevarez-Erunez returns from his trip, whichever is earlier.

**IT IS SO FOUND AND ORDERED** this 19th day of September, 2023.

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE