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JULIO NEVAREZ-ERUNEZ

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JULIO NEVAREZ-ERUNEZ, Defendant.	Case No. 2:22-cr-210 DJC **STIPULATION AND ORDER TO MODIFY CONDITIONS OF PRETRIAL RELEASE** Judge: Hon. Carolyn K. Delaney

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 the temporary modification of Mr. Nevarez-Erunez's conditions of release ordered on September 19, 2023, *see* ECF No. 90, be extended so that he can continue to participate in a work project in Brewster, Washington until October 13, 2023.

Mr. Nevarez-Erunez was released from custody onto pretrial supervision on April 26, 2023. ECF No. 70. The conditions of his release require him to participate in location monitoring and abide by a daily curfew to his residence in Oregon from 8:00 p.m. to 6:00 a.m. *See* ECF No 75 at ¶¶12, 13. On September 19, 2023, those conditions were temporarily lifted from September

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25, 2023–October 6, 2023, in order to allow Mr. Nevarez to leave Oregon and travel to Washington for a work project. *See* ECF No. 90.

Mr. Nevarez-Erunez now seeks permission to extend the temporary modification of his conditions of release until October 13, 2023. His work trip did not commence as planned, and the project will extend past October 6, 2023 by several days. As a result, he requests that conditions 12 and 13 continue to be lifted until October 13, 2023, or until he returns to his residence, whichever is earlier. Given his continued compliance for over 90 days and his current employment, Pretrial Services does not oppose this continued modification. Likewise, the government does not oppose the extended 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 lifted until October 13, 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.

Dated: October 3, 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: October 3, 2023

PHILLIP A. TALBERT
UNITED STATES ATTORNEY

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

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, until approximately October 13, 2023. Special Conditions 12 and 13 will continue to be temporarily lifted until October 13, 2023, or until Mr. Nevarez-Erunez returns from his trip, whichever is earlier.

IT IS SO FOUND AND ORDERED

Dated: October 3, 2023

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE