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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. Kendall J. Newman

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 Special Conditions 12 and 13 be removed from Mr. Nevarez-Erunez's conditions of release.

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

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

In addition, in late September, Mr. Nevarez-Erunez sought permission to temporarily suspend Special Conditions 12 and 13, related to his location monitoring and curfew, in order to travel out of district on a work project. *See* ECF No. 90. After completing the work project, he reported back to pretrial services with no issues.

In light of this, the parties now request that Mr. Nevarez-Erunez's conditions of release be modified, and specifically that Conditions 12 and 13 be removed entirely. Pretrial Services has no objection to the modification. All other previously imposed terms and conditions will remain in full force and effect.

Dated: November 1, 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: November 1, 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 remove Special Conditions 12 and 13. All other previously imposed terms and conditions will remain in full force and effect.

IT IS SO FOUND AND ORDERED.

Dated: November 1, 2023

KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

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