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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. PING SHERRY CHAN, Defendant.	CASE NO. CR.S-96-00350-WBS GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO ORDER TO SHOW CAUSE

The United States of America, through its counsel of record, William S. Wong, Assistant United States Attorney, hereby respectfully requests an extension of time to respond to the Court's Order to Show Cause.

The court originally set February 18, 2014 to respond to its order. The government requested and was granted extensions of time to September 19, 2014 to file its response. For the reasons previously stated, the government needed additional time to resolve the charges contained in the indictment captioned United States America v. Ping Sherry Chan, CRS 96 – 350 WBS. During the previous extensions, the government was successful in achieving a resolution of the charges against defendants Mady Chan, Linda Chan, Bao Gin Chen, Lizhen Chen, and Jimmy Leung. Additionally, the government and counsel Scott Tedmon will have a resolution of defendant Danny Leung's cases ready for disposition in this court in the next few weeks. Furthermore, judgment and sentencing for defendant Gary Kwong will be scheduled in this Court within 30 days. The remaining defendants in this case all

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fall under the category of family members/close friends related to defendant John That Luong. Defendant John That Luong is presently serving a life sentence, plus 65 years in a federal prison on the East Coast. The Stipulation for Consent, Judgment of Forfeiture has been emailed to John That Luong's counsel, Dan Koukol, Esq. An offer to resolve the entire case is pending. Because the defendant is housed in a Bureau of Prisons facility on the east coast, this presents a logistic problem in attempting to resolve the remaining defendants in this case, the government respectfully requests an additional 60 days to November 19, 2014, to resolve the charges pending against the remaining defendants in this case without having to utilize government resources and time necessary to adequately respond to the court's inquiry (which will require conducting research and ordering transcripts of court proceedings that relate to the issue of waiver of speedy trial).

The government believes that with this additional extension, a resolution of the entire money laundering case is a good possibility. Accordingly, the government respectfully requests that it be allowed additional 60 days to November 19, 2014 to file its response to the Court's Order to Show Cause.

Dated: September 26, 2014

BENJAMIN B. WAGNER
United States Attorney

/s/ William S. Wong
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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. PING SHERRY CHAN, Defendant.	CASE NO. CR.S-96-00350-WBS ORDER GRANTING GOVERNMENT'S REQUEST FOR EXTENSION OF TIME TO RESPOND TO COURT'S ORDER TO SHOW CAUSE

Good cause having been shown, IT IS HEREBY ORDERED that the Government's request for an extension of time to respond to the Court's Order to Show Cause IS GRANTED. The government shall file its response no later than November 19, 2014.

DATED: September 30, 2014

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE