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Counsel for Defendant SULTAN

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|---------------------------|---|---|
| UNITED STATES OF AMERICA, |) | NO. 17-CR-585-PJH |
| |) | |
| Plaintiff, |) | |
| |) | STIPULATION AND [PROPOSED] ORDER |
| v. |) | FOR TEMPORARY RELEASE TO |
| |) | ATTEND FUNERAL |
| SAMMY SULTAN, |) | |
| |) | |
| Defendant. |) | <u>The Hon. Kandis A. Westmore</u> |
| |) | |

Defendant, Sammy Sultan, was detained by the Court after violating the terms of his pretrial release. Mr. Sultan has pled guilty to Count One of the Information and is awaiting sentencing. The parties stipulate and agree that Mr. Sultan can be temporarily released per the conditions described herein so that he may be present to bury his mother who died unexpectedly on January 17, 2018. The burial and services will take place on Friday, January 19, 2018. Counsel for the defense has spoken with Mr. Sultan's sister, Summer Sultan, who has agreed to act as Mr. Sultan's custodian during the limited release period, has arranged for the persons identified below to pick him up and return him into custody as indicated. The parties agree that Mr. Sultan may be released early in the morning on January 19, 2018. Ms. Sultan will pick up Mr. Sultan at the North County Jail and she will escort him to the burial and services. She has arranged for a close family friend, Naomi

1 Pennington, to return Mr. Sultan to the United States Marshal lock-up no later than 1:30 p.m. on
2 Friday, January 19, 2017. Ms. Sultan is unable to accompany her brother back to the lock-up because
3 the services for her mother will not be over in time.

4
5 DATED: January 18, 2018

6
7 Respectfully submitted,

8
9 /s/
10 THOMAS R. GREEN
11 Assistant United States Attorney

/s/
ANGELA M. HANSEN
Assistant Federal Public Defender

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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| UNITED STATES OF AMERICA, |) | NO. 17-CR-585-PJH |
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| |) | |
| Plaintiff, |) | [PROPOSED] ORDER TEMPORARILY |
| v. |) | RELEASING DEFENDANT FOR |
| |) | FUNERAL |
| |) | |
| SAMMY SULTAN, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |
| |) | |

The United States Marshal Service and/or the Alameda County Jail shall release defendant Sammy Sultan, PFN UKN224, no later than 7:00 a.m. on January 19, 2018 so that he may attend his mother's burial. Mr. Sultan is ordered to surrender to the Oakland United States Marshal Service lock up on the first floor of the Oakland Federal Building, 1301 Clay Street, Oakland, California, by no later than 1:30 p.m. on January 19, 2018. Mr. Sultan's sister shall accompany Mr. Sultan from the jail to the burial and his family friend, Naomi Pennington, shall return him to the U.S. Marshal Service on Friday afternoon.

IT IS SO ORDERED.

DATED: 1/18/18



THE HON. KANDIS A. WESTMORE
United States Magistrate Judge