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 UNITED STATES OF AMERICA
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11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,
 14 Plaintiff,
 15 v.
 16 CHARLES LYNCH,
 17 Defendant.
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No. CR 07-689-GW

STIPULATION AND JOINT MOTION TO
 CONTINUE STATUS CONFERENCE

Proposed New Dates:

Joint Status Report: 03/05/2019
 Status Conference: 03/07/2019

20 Plaintiff United States of America, by and through its counsel
 21 of record, the United States Attorney for the Central District of
 22 California, and defendant Charles Lynch ("defendant"), by and through
 23 his counsel of record, Rebecca M. Abel and Angela Viramontes, Deputy
 24 Federal Public Defenders, hereby stipulate to the following in
 25 support of a joint motion to set new dates for a status conference
 26 and report to the Court. If granted, the parties will file a joint
 27 status report by noon on March 5, 2019, and a status conference will
 28 be held on March 7, 2019 at 10:00 a.m. This request which is based

1 on facts stipulated to below, the files a records in this case, and
2 the schedule of counsel and the Court:

3 1. As directed by the Court at the Status Conference of
4 January 7, 2019, counsel have met and conferred regarding scheduling
5 the litigation of the issues on remand from the Ninth Circuit in the
6 above-captioned matter. Defendant's new trial counsel have recently
7 appeared in the matter. They need additional time to consult with
8 their client and to study the extensive existing record before
9 meeting and conferring with the government again regarding
10 scheduling. The government joins in the request for additional time.
11 The parties therefore jointly request that the Court issue a new
12 schedule whereby: (a) the parties shall file a joint status report
13 regarding scheduling and related issues by noon on March 5, 2019 and
14 (b) a status conference shall held on March 7, 2019 at 10:00 a.m.

15 2. The requested schedule represents a reasonable estimate of
16 the time necessary to complete the parties' work in light of the
17 factors above and the schedule of counsel. The parties have also
18 consulted with the Court's clerk in advance regarding the date of the
19 status conference.

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