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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.

No. CR 07-689-GW

STIPULATION AND JOINT MOTION TO  
 CONTINUE BRIEFING SCHEUDLE AND  
 HEARING

Proposed New Dates:

Initial Briefs: 04/25/2019  
Responsive Briefs: 05/16/2019  
Hearing Date: June 3, 2019;  
 9:00a.m.

21 Plaintiff United States of America, by and through its counsel  
 22 of record, the United States Attorney for the Central District of  
 23 California, and defendant Charles Lynch ("defendant"), by and through  
 24 his counsel of record, Rebecca M. Abel, Angela Viramontes, and  
 25 Alexandra W. Yates, Deputy Federal Public Defenders, hereby stipulate  
 26 to the following in support of a joint motion for a two-week  
 27 continuance of the dates for preliminary briefing in this matter.  
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1           If granted, the parties will file their simultaneous briefs on  
2 the issues previously identified by the Court and parties (limited to  
3 20 pages) on April 25, 2019, and simultaneous responsive briefs  
4 (limited to 7 pages) on May 16, 2019, with a hearing continued from  
5 May 20, 2019 to June 3, 2019 at 9:00 a.m. This request is based on  
6 the facts stipulated to below, the files and records in this case,  
7 and the schedule of counsel:

8           1.     At the March 21, 2019 status conference, the parties and  
9 Court agreed on a briefing schedule for the preliminary issues  
10 identified in the parties' March 19, 2019 status report. See Clerk's  
11 Record Nos. 483 (status report) at 2; 485 (minutes of status  
12 conference).

13           2.     The parties need additional time to complete their  
14 research and briefing of these issues. They have mutually agreed to  
15 a two-week continuance of the briefing schedule and hearing in light  
16 of the other obligations of counsel and the nature and complexity of  
17 the issues to be briefed. The parties represent that this request is  
18 not for the purposes of the delay, but a reasonable period to  
19 complete their work in light of an exercise of due diligence and the  
20 factors identified herein.

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