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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: 05/09/2019
Responsive Briefs: 05/30/2019
Hearing Date: June 17, 2019;
 9:00 a.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 May 9, 2019, and simultaneous responsive briefs (limited
4 to 7 pages) on May 30, 2019, with a hearing continued from June 3,
5 2019 to June 17, 2019 at 9:00 a.m. This request is based on the
6 facts stipulated to below, the files and records in this case, and
7 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. On April 8, 2019, the parties stipulated to and, on April
14 14, 2019, the Court ordered the continuance of all dates by two
15 weeks. See Clerk's Record Nos. 486 (stipulation); 487 (order).

16 3. Since that continuance, the parties have met and conferred.
17 At the government's request, the defense has agreed to a further two-
18 week continuance of the briefing schedule and hearing in light of the
19 other obligations of counsel and the nature and complexity of the
20 issues to be briefed. The parties represent that this request is not
21 for the purposes of delay, but a reasonable period to complete their
22 work in light of an exercise of due diligence and the factors
23 identified herein.

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