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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

GOVERNMENT'S EX PARTE APPLICATION
 TO CONTINUE MOTION DATES

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 19 Plaintiff United States of America, by and through its counsel
 20 of record, the United States Attorney for the Central District of
 21 California, here by moves to continue the dates for future events on
 22 remand in the above-captioned case, as follows:

- 23 • Government's opposition to defendant's motion to dismiss.
 24 (Dkt.557): February 5, 2023. ;
- 25 • Defendant's Reply to Motion to Dismiss: February 19, 2023;
- 26 • Hearing on Motion: February 26, 2023.

1 since the filing of the motion to dismiss. As noted in prior
2 continuance motions to this Court, defendant's complex motion to
3 enjoin took over two years to file after the parties' exchanged
4 expert disclosures during with time the government's lead expert
5 witness retired. That government expert had done extensive work on
6 the voluminous financial records case that needs to be duplicated and
7 expanded upon . I need additional time to confer with the agents in
8 this case in order to determine when that can be completed, and to
9 put that information put in the government's opposition to the motion
10 to dismiss along with other issues in that opposition.

11 6. I have not been able to complete the above tasks in the
12 time currently set by the Court. Since the motion was filed I went
13 on my only extended leave of the year around the holiday season, from
14 which I recently returned. In the time I was in the office since the
15 motion was filed, in addition to this matter, I had to complete work
16 on a number of other complex matters that were pending at the time
17 the motion was filed. This included two complex sentencings and
18 hearings in a gang matter, a post-trial motion in a different matter,
19 and a further sentencing brief before this Court in other matters.

20 7. Defendant is not in custody, but on bond with minimal to no
21 conditions. (See, e.g., Dkt. 543).

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