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6 Attorneys for Plaintiff
7 United States of America

8
9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 IRMA OLGUIN, JR.,
15 and JAKE SOBERAL

16 Defendants.

CASE NO. 1:23-MJ-00136-SKO

STIPULATION TO CONTINUE PRELIMINARY
HEARING AND EXCLUDE TIME

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19 The parties stipulate as follows:

20 1. The complaint was issued in this case on November 8, 2023, and the defendants made
21 their initial appearances the following day. The preliminary hearing was scheduled for January 25,
22 2024, and was then continued until April 4, 2024, with appropriate time exclusions, so that defense
23 counsel could review discovery and consider a pre-indictment resolution of the case.

24 2. The government has produced initial discovery to defense counsel. The discovery is over
25 one million pages, and it includes detailed financial records, text messages, emails, and other
26 correspondence, and interview reports. The parties have met and conferred regarding the evidence in
27 the case and the terms of potential plea agreements.

1 3. The parties now agree to further continue the preliminary hearing until May 16, 2024.
2 The parties do not expect to request any additional continuances.

3 4. The parties agree that good cause exists for the continuance because the extension is
4 required to allow defense counsel reasonable time to complete their review of the discovery, prepare for
5 any litigation, and fully consider a pre-indictment resolution of the case.

6 5. The parties agree that the interests of justice served by granting this continuance
7 outweigh the best interests of the public and the defendants in a speedy trial. The parties also agree that
8 the period from March 15, 2024, through May 16, 2024, should be excluded. Fed. R. Crim. P. 5.1(d); 18
9 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

10 IT IS SO STIPULATED.

11 Dated: March 15, 2024

PHILLIP A. TALBERT
United States Attorney

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14 /s/ Joseph Barton

Joseph Barton
Henry Carbajal III
Assistant United States Attorneys

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17 Dated: March 15, 2024

/s/ Daniel Olmos

Daniel Olmos
Counsel for Irma Olguin, Jr.

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21 Dated: March 15, 2024

/s/ Eric MacMichael

Eric MacMichael
Counsel for Jake Soberal

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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 IRMA OLGUIN, JR.,
and JAKE SOBERAL

15 Defendants.
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CASE NO. 1:23-MJ-00136-SKO

ORDER CONTINUING PRELIMINARY
HEARING AND EXCLUDING TIME

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19 The Court has read and considered the parties' stipulation to further continue the preliminary
20 hearing in this case and exclude time. The Court finds there is good cause for the continuance so as to
21 allow defense counsel reasonable time to complete their review of the discovery, prepare for any
22 litigation, and fully consider a pre-indictment resolution of the case. The Court also finds that the
23 interests of justice served by granting the continuance outweigh the interests of the public and the
24 defendants in a speedy trial. Therefore, for good cause shown:

- 25 1. The preliminary hearing is continued from April 4, 2024, until May 16, 2024, at 2:00
26 p.m., and the defendants shall appear at that time before the Fresno duty magistrate
27 judge; and
28 2. The period from April 4, 2024, through May 16, 2024, shall be excluded pursuant to

1 Federal Rule of Criminal Procedure 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

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3 IT IS SO ORDERED.

4 Dated: March 18, 2024



UNITED STATES MAGISTRATE JUDGE

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