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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13 v.)

14 ,)
SHAUNA MARIE FABREGA)

15 Defendant.)
_____)

Case No. 1:12-CR-00264-AWI

**STIPULATION AND ORDER FOR
CONTINUANCE OF STATUS
CONFERENCE**

Date : May 13, 2013

Time : 1:00 p.m.

Judge : Barbara McAuliffe

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18 It is hereby stipulated by and between Benjamin B. Wagner, United States Attorney and Grant
19 B. Rabenn, Assistant U.S. Attorney and Dale A. Blickenstaff, Attorney for SHAUNA MARIE
20 FABREGA, that the Status Conference set for May 13, 2013 at 1:00 p.m. be taken off calendar and
21 instead the matter set for further status conference on June 24, 2013 at 1:00 p.m

22 The defense has received a plea agreement and its contents have been discussed with Ms.
23 Fabrega. Ms. Fabrega is a single mother raising four children with the youngest being born on
24 November 27, 2012. Ms. Fabrega needs additional time to make arrangements for the placement of her
25 children before her anticipated incarceration. Also, since she lives in Palmdale, California, it is difficult
26 for her to travel to Fresno for discussions with defense counsel regarding the evidence in the case. She
27 has met with defense counsel one time and another conference is necessary to complete a thorough
28 review of the evidence. The additional time is necessary to complete the foregoing tasks.

1 The parties agree that the time between the date of this stipulation and the new status conference
2 hearing date of June 24, 2013 at 1:00 p.m., shall be excluded in the interests of justice, including but
3 not limited to continuity of counsel and reasonable time necessary for effective preparation pursuant
4 to 18 U.S.C. Sections 3161(h)(7)(A) and 3161(h)(7)(B)(I) and (iv).

5 For the reasons set forth above, the parties respectfully request that the hearing scheduled for
6 May 13, 2013 at 1:00 p.m. be dropped from the calendar and a new status conference be scheduled for
7 June 24, 2013 at 1:00 p.m.

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9 Dated: April 28, 2013

Respectfully submitted,

10 BENJAMIN B. WAGNER
11 United States Attorney

12 By /S/ Grant B. Rabenn
13 GRANT B. RABENN
Assistant U.S. Attorney

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15 Dated: April 28, 2013

By /S/ Dale A. Blickenstaff
16 DALE BLICKENSTAFF
Attorney for SHAUNA MARIE FABREGA

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19 **IT IS SO ORDERED.**

20 Time is excluded pursuant to 18 U.S.C. Sections 3161(h)(7)(A) and 3161(h)(7)(B)(I) and (iv).

21 IT IS SO ORDERED.

22 Dated: April 30, 2013

/s/ Barbara A. McAuliffe
23 UNITED STATES MAGISTRATE JUDGE