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7

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.  
16  
17

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

**STIPULATION AND ORDER FOR  
CHANGE OF PLEA HEARING DATE**

Date : June 24, 2013

Time : 1:00 p.m.

Judge : Barbara McAuliffe

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 June 24, 2013 at 1:00 p.m. be taken off calendar and  
21 instead the matter set for change of plea before the Honorable Anthony Ishii on July 22, 2013 at 10  
22 am.

23 The Defendant intends to accept the offer to plead guilty to the terms of a certain plea agreement  
24 which has been tendered to the defense. The Defendant lives in Palmdale, California and even though  
25 she has had the terms of the plea agreement explained to her in person and over the telephone she does  
26 not have a copy of the agreement which she could execute and return for timely filing before the status  
27 conference on Monday.

28 There would be sufficient time for the above procedure to be completed before the date

1 proposed for change of plea.

2 The parties agree that the time between the date of this stipulation and the date for change of  
3 plea hearing of July 22, 2013 at 10 am., shall be excluded in the interests of justice, including but not  
4 limited to continuity of counsel and reasonable time necessary for effective preparation pursuant to 18  
5 U.S.C. Sections 3161(h)(7)(A) and 3161(h)(7)(B)(I) and (iv).

6 For the reasons set forth above, the parties respectfully request that the status conference  
7 scheduled for June 24, 2013 at 1:00 p.m. be dropped from the calendar and a hearing date of July 22,  
8 2013 at 10 am. be scheduled for change of plea.

9  
10 Dated: June 20, 2013

Respectfully submitted,

11 BENJAMIN B. WAGNER  
12 United States Attorney

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

15  
16 Dated: June 20, 2013

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

18  
19  
20 **IT IS SO ORDERED.**

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

22 IT IS SO ORDERED.

23 Dated: June 20, 2013

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