

1 JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney

2 BRIAN J. STRETCH(CABN 163973)  
3 Chief, Criminal Division

4 W.S. WILSON LEUNG (CABN 190939)  
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
7 Telephone: (415) 436-6758  
FAX: (415) 436-7234

8 Attorneys for the United States of America

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 UNITED STATES OF AMERICA )

No. CR-08-0531 JSW

14 v. )

15 STIPULATION AND ~~PROPOSED~~  
16 ORDER DOCUMENTING WAIVER )

17 JONATHAN CRUZ-RAMIREZ,  
a/k/a "Soldado," )

18 Defendant. )  
19

20  
21 On August 11, 2008, defendant Jonathan Cruz-Ramirez, appeared with his counsel, Susan  
22 Raffanti, Esq., before Magistrate Judge Joseph C. Spero for arraignment and the initial  
23 appearance on the indictment, and the initial appearance before the Honorable Jeffrey S. White,  
24 U.S.D.J., was scheduled for August 28, 2008. With the agreement of the parties and with the  
25 consent of the defendant, the Court enters this order excluding time under the Speedy Trial Act  
26 from August 11, 2008 to August 28, 2008. The parties agree and stipulate, and the Court finds  
27 and holds, as follows:

28 1. The defendant, Jonathan Cruz-Ramirez, appeared before the Court on August 11,

1 2008, and was arraigned. The Court scheduled August 28, 2008 as the defendant's initial  
2 appearance before the District Court.

3 2. Between August 11, 2008 and August 28, 2008, the Government will be  
4 producing discovery for Ms. Raffanti's review. Accordingly, the parties have requested that time  
5 be excluded under the Speedy Trial Act from August 11, 2008 to August 28, 2008 for this  
6 purpose.

7 3. Given these circumstances, the Court finds that the ends of justice served by  
8 excluding the period from August 11, 2008 to August 28, 2008 from Speedy Trial Act  
9 calculations outweighs the interests of the public and the defendant to a speedy trial, by allowing  
10 the production and review of discovery, thereby ensuring effective preparation of counsel, in  
11 accordance with 18 U.S.C. § 3161(h)(8)(A) and (B).

12  
13 STIPULATED:

14  
15 DATED: August 12, 2008

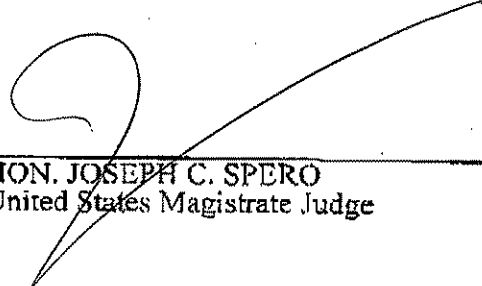
  
SUSAN RAFFANTI, ESQ.  
Attorney for JONATHAN CRUZ-RAMIREZ

16  
17  
18 DATED: August 12, 2008

  
W.S. WILSON LEUNG  
Assistant United States Attorney

19  
20  
21 IT IS SO ORDERED.

22 DATED: August 13, 2008

  
HON. JOSEPH C. SPERO  
United States Magistrate Judge

23  
24  
25  
26  
27  
28