

BENJAMIN B. WAGNER
United States Attorney
JUSTIN L. LEE
Assistant U.S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
(916) 554-2700

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	2:13-MJ-0222-DAD
)	
Plaintiff,)	
)	STIPULATION AND ORDER
v.)	CONTINUING PRELIMINARY HEARING
)	DATE
JOLENE CHAN,)	
)	
)	Judge: Hon. Carolyn K. Delaney
Defendant.)	
)	
)	

STIPULATION

The United States, by and through its undersigned counsel, and the defendant, by and through her counsel of record, hereby stipulate as follows:

1. This matter was previously set for a Preliminary Hearing on September 27, 2013.
2. By this Stipulation, the parties now move to continue the Preliminary Hearing until November 8, 2013, at 2:00 p.m.
3. This is the third request to move the defendant's preliminary hearing.

///

1 4. The parties have discussed a potential pre-indictment resolution
2 of this matter. The parties need further time to discuss this
3 matter, discuss any potential consequences, and to allow counsel
4 for the defendant reasonable time necessary for preparation and
5 further investigation.

6 5. The defendant is presently out of custody and subject to the
7 supervision of a Pretrial Services Officer.

8 6. Good cause exists under Rule 5.1(d) of the Federal Rules of
9 Criminal Procedure.

10 **IT IS SO STIPULATED.**

11
12 DATED: September 26, 2013 /s/ Justin L. Lee
13 JUSTIN L. LEE
Assistant U.S. Attorney

14 DATED: September 26, 2013 /s/ Michael L. Chastaine
15 MICHAEL L. CHASTAINE
16 Attorney for Jolene Chan
(as authorized on September 25, 2013)

17
18 **ORDER**

19 IT IS SO FOUND AND ORDERED, this _____ day of September, 2013.

20
21
22 _____
23 Hon. CAROLYN K. DELANEY
United States Magistrate Judge