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6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF ARIZONA**

9 UNITED STATES OF AMERICA,
 Plaintiff,

11 v.

12 LEOBIGILDO ANGEL-MENDEZ, et al
 13 Defendants.

CR 04-2300-TUC-FRZ (BPV)
 STIPULATED MOTION TO
 CONTINUE SENTENCING
 (THIRD REQUEST)

14
 15 COMES NOW Mr. Angel-Mendez, by counsel, and moves to continue the June 30, 2006
 16 sentencing in this matter to allow the parties time to prepare responses to the defense objections
 17 to the presentence report. Defense counsel required additional time prepare the objections
 18 because (1) he moved his office at the end of May and has spent a disproportionate amount of
 19 time on administrative tasks, and (2) defense counsel's notes regarding the video depositions
 20 were focused on trial issues, and it took counsel longer than expected to find the testimony
 21 needed for guideline objection purposes. AUSA Beverly Anderson has no objection to this
 22 motion. A continuance of thirty (30) days is requested to allow the government and probation
 23 time to respond to the objections.

24 RESPECTFULLY SUBMITTED 25 June 2006

25 s/ R. Antonio Felix

26 Attorney for Leobigildo Angel-Mendez

27 **Delivery by electronic or**
other means to:
 28 The Honorable Frank R. Zapata
 AUSA Beverly Anderson
 U.S. Probation Officer Garret C. Pfalmer