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7
 8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF ARIZONA

10	United States of America,)	
)	
11	Plaintiff,)	CR 06-2040-TUC-FRZ (CRP)
)	
12	vs.)	
)	GOVERNMENT’S MOTION TO
13	Camilo Andres Ruiz-Torres,)	CONTINUE SENTENCING
)	(1 st Request)
14	Defendant.)	
)	
15	_____)	

16 Plaintiff, United States of America, by and through its undersigned counsel, hereby
 17 respectfully requests that this Court continue the sentencing of [Camilo Andres Ruiz-Torres](#)
 18 presently scheduled for [October 1, 2007 at 1:30 p.m.](#) for a period of [at least 10 days but](#)
 19 [before October 16, 2007.](#) [Counsel for the government will be out of the District from](#)
 20 [October 16, 2007, through November 2, 2007.](#) The reason for the continuance is that on
 21 September 10, 2007, defense counsel filed a motion for extension of time to September 12,
 22 2007, to file objections to the Presentence Report. As a courtesy, the government did not
 23 object to defendant’s motion. This Court granted defendant’s motion in its Order of
 24 September 11, 2007. When no objections were received by the government by September
 25 17, 2007, undersigned counsel called defense counsel to determine the status of the
 26 objections. Defense counsel’s outgoing voicemail indicated that she was out of the office

1 and would return on September 24, 2007. On September 25, 2007, undersigned counsel
2 received a courtesy email copy of a Sentencing Memorandum filed under seal by the
3 defendant. Upon review of the document, the government realized that despite being labeled
4 as a Sentencing Memorandum, it was actually a document containing several motions for
5 downward departure. This document was filed less than ten days before the current
6 sentencing date, thereby not giving the government its requisite time to respond.

7 Undersigned counsel has left messages for the defense counsel and the probation
8 officer regarding this motion to continue but at the time of filing, has not received responses
9 from either one.

10 Respectfully submitted this 25th day of September, 2007.

11 DANIEL G. KNAUSS
12 United States Attorney
13 District of Arizona

14 *s/Claire K. Lefkowitz*

15 CLAIRE K. LEFKOWITZ
16 Assistant U.S. Attorney

16 Copy of the foregoing served
17 electronically or by other means
18 this 25th day of September, 2007, to:

19 Wanda K. Day
20 Attorney for defendant

21 Brett J. Snyder
22 U.S. Probation
23 Tucson, AZ 85701