

1 JON M. SANDS  
Federal Public Defender  
2 District of Arizona  
850 W. Adams Street, Ste. 201  
3 Phoenix, Arizona 85007-2730  
Telephone: (602) 382-2700  
4 Facsimile: (602) 382-2800

5 CRAIG ORENT, #015512  
Asst. Federal Public Defender  
6 Attorney for Defendant  
craig\_orent@fd.org  
7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF ARIZONA

10 United States of America,  
11 Plaintiff,

12 vs.

13 Orlando Romero-Resendez,  
14 Defendant.  
15

No. 09-7357-M (LOA)

**DEFENDANT'S MOTION TO  
EXPEDITE THE CHANGE OF  
PLEA HEARING DATE**

(Reentry After Deportation - 8 U.S.C,  
1326(a))

**(Unopposed)**

**(Expedited Ruling Requested)**

16  
17  
18 A change of plea hearing is presently scheduled for August 21, 2009 at 10:00  
19 a.m. Mr. Romero-Resendez respectfully requests that the Court reset the hearing to the  
20 earliest possible date.

21 The reason for the request is that Mr. Romero-Resendez will be pleading  
22 guilty in exchange for the government's standard fast-track offer, which, in a case  
23 charging a violation of 8 U.S.C, 1326(a), could result in a time served sentence, and in  
24 any event will include a sentencing cap, anticipated to be three months. As a result, Mr.  
25 Romero-Resendez wants to plead guilty and proceed to sentencing as quickly as is  
26 reasonably possible.

27 Assistant United States Attorney Melissa Karlen has no objection to the  
28 request.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully submitted: August 6, 2009.

JON M. SANDS  
Federal Public Defender

*s/Craig Orent*  
\_\_\_\_\_  
CRAIG ORENT  
Assistant Federal Public Defender

I hereby certify that on August 6, 2009, I electronically transmitted the attached document to the Clerk's Office using the ECF System for filing and transmittal to the following ECF registrants:

**CLERK'S OFFICE**  
United States District Court  
Sandra Day O'Connor Courthouse  
401 W. Washington  
Phoenix, Arizona 85003

**MELISSA KARLEN**  
Assistant U.S. Attorney  
United States Attorney's Office  
Two Renaissance Square  
40 N. Central Avenue, Suite 1200  
Phoenix, Arizona 85004-4408

Copy mailed to:

**ORLANDO RESENDEZ-ROMERO**  
Defendant

*s/Alicia Smith*  
\_\_\_\_\_