

1 DANIEL G. KNAUSS  
 United States Attorney  
 District of Arizona  
 2 MUNISH SHARDA  
 Assistant United States Attorney  
 3 405 W. Congress St., Suite 4800  
 Tucson, Arizona 85701  
 4 Telephone: (520) 620-7300  
 E-mail: munish.sharda@usdoj.gov  
 5 Attorneys for Plaintiff

<input type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <b>AUG 16 2007</b> </div>	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY _____

6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF ARIZONA

9 United States of America, )  
 )  
 10 Plaintiff, )  
 v. )  
 11 Michael James Adams, )  
 12 Defendant. )  
 13 \_\_\_\_\_ )

C 07-1059-TUC-FR2 (HLE)

Mag. No. 07-6773M

STIPULATION AND JOINT  
 MOTION FOR RELEASE OF  
 MATERIAL WITNESSES

14 The United States of America, through undersigned counsel, and the defendant,  
 15 individually and through counsel, do hereby agree and stipulate as follows:

- 16 (1) Material witnesses Jose Efrain Madrid-Perez and Jesus Manuel Madrid-  
 17 Chavez are not citizens of the United States;
- 18 (2) Material witnesses Jose Efrain Madrid-Perez and Jesus Manuel Madrid-  
 19 Chavez entered the United States illegally on or about July 26, 2007;
- 20 (3) Material witnesses Jose Efrain Madrid-Perez and Jesus Manuel Madrid-  
 21 Chavez were found in the vehicle driven by the defendant, Michael James  
 22 Adams;
- 23 (4) The government may elicit hearsay testimony from the arresting agents,  
 24 processing agent, or any other agent involved in this case regarding any  
 25 statements made by the above-referenced material witnesses contained in the  
 26 disclosure, and such testimony shall be admitted as substantive evidence in

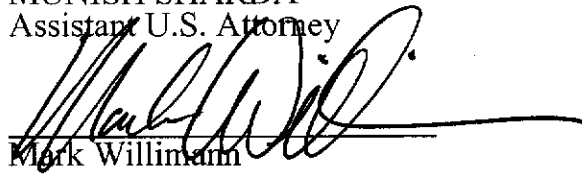
any hearing or trial in the above-encaptioned matter.

Based on the foregoing, the parties jointly move for the release of the above-named material witnesses to the Department of Homeland Security for return to their country of origin.

DANIEL G. KNAUSS  
United States Attorney  
District of Arizona



MUNISH SHARDA  
Assistant U.S. Attorney



Michael James Adams  
Defendant

Mark Williamson  
Attorney for Defendant