

1 H. Ty Kharazi, SBN 187894
2 **YARRA, KHARAZI & ASSOCIATES**
3 1250 Fulton Mall
4 Fresno, CA 93721
5 Telephone: (559) 441-1214
6 Facsimile: (559) 441-1215

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8 Attorneys for Defendant,
9 **SAFEE AYUB SALAMA**

10
11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 **SAFEE AYUB SALAMA,**

17 Defendant.

) **No.: 1:11-CV-00145-OWW-MSJ**

) **STIPULATION TO CONTINUE**
) **SCHEDULING CONFERENCE AND**
) **ORDER**

) **Date: July 14, 2011**

) **Time: 8:15 a.m.**

) **Crtm: 3**

) **Judge: Oliver W. Wanger,**
) **U.S. District Judge**

18 **PLAINTIFF UNITED STATES OF AMERICA** through their attorney of record, **KIRSTEN**
19 **L. DAEUBLER** and **DEFENDANT SAFE E AYUB SALAMA** through his attorney of record, **H. TY**
20 **KHARAZI** hereby stipulate to vacate and continue the Scheduling Conference as follows:

21 Plaintiff intends to file and has filed a First Amended Complaint to Revoke Naturalization in
22 this action. Defendant has consented to permitting Plaintiff to file the amended complaint; a
23 stipulation to Amend Complaint has been filed. The First Amended Complaint was filed and
24 electronically served on Defendant's counsel on June 22, 2011.

25 Defendant's counsel has yet to study the First Amended Complaint and therefore, he is not in
26 a position to anticipate the issues raised in this amended complaint, formulate a discovery plan and
27 anticipate a trial length. Thus, parties believe that a scheduling conference in the above date may be
28 premature at this time.

1 Parties, jointly respectfully request that the court continue the current Scheduling Conference
2 60 to 90 days. This time will allow Defendant to respond to the Amended Complaint and the parties
3 to formulate a discovery plan.

4 Plaintiff's counsel is respectfully requesting that she would be allowed to appear by
5 telephone because her office is in Washington DC. Defendant has no objection to the telephonic
6 appearance by the plaintiff's counsel at the scheduling conference.

7
8 Dated: June 23, 2011

/s/ H. Ty Kharazi

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10 _____
H. Ty Kharazi, Attorney for Defendant,
SAFEER AYUB SALAMA

11
12 Dated: June 23, 2011

/s/ Kristen L. Daeubler

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14 _____
Kirsten L. Daeubler, Attorney for Plaintiff,
UNITED STATES OF AMERICA

15 **ORDER**

16 Based on the forgoing, the Scheduling Conference currently set for July 14, 2011 shall be
17 vacated and reset as follows:

18 Date: September 30, 2011

19 Time: 8:15AM

20 Department: 3

21 A Joint Scheduling Conference Statement must be electronically filed 7 days before the
22 hearing date and shall be emailed, in WordPerfect or Word format, to

23 owworders@caed.uscourts.gov.

24
25 The parties may appear telephonically. Parties are directed to set up a conference call (either
26 through the operator or on an internal phone system). After all parties appearing telephonically are
on one line, call Judge Wanger's chambers at (559) 499-5650 at the time of the hearing. Courtroom

1 Deputy Renee Gaumnitz shall be advised by email, rgaumnitz@caed.uscourts.gov, who will be
2 appearing telephonically and provided a contact number of the party who is initiating the conference
3 call.
4
5

6 IT IS SO ORDERED.

7 Dated: June 23, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE