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6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA

8	UNITED STATES OF AMERICA)	CASE NO.: SACR 08-279-CJC
9)	
10	Plaintiff,)	STIPULATION TO CONTINUE
11)	SENTENCING
12	v.)	
13	MICHAEL GRAYSON)	[Honorable District Court Judge Carney]
14	Defendant.)	
15)	

16 Plaintiff United States of America, by and through its attorney of record, Assistant United
17 States Attorney Jennifer L. Waier, and defendant Michael Grayson, by and through his respective
18 counsel of record, Brett A. Greenfield, hereby stipulate as follows:

19 1. That the sentencing hearing currently set for Monday, October 31, 2011 be continued to
20 Monday, January 23, 2012.

21 Both the defendant and the Government agree that there are still pending productive meetings
22 that have been scheduled and will be scheduled during the proposed extended time period, the
23 impact of which may be significant for the court to consider at the time of sentencing. In addition,
24 defendant's counsel encountered several calendaring conflicts over the last six months as a result of
25 out of district trials. Defendant's counsel have remained in communication with AUSA Waier during
26 the commencement of their unrelated trial schedule and are in the process of arranging dates going
27 forward.

28

1 So Stipulated:

2 September 8 , 2011

ANDRÉ BIROTTE JR.
United States Attorney
ROBB C. ADKINS
Assistant United States Attorney
Chief, Santa Ana Office

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September 8, 2011

/s/ Jennifer L. Waier

By: _____
JENNIFER L. WAIER
Assistant United States Attorney
Attorneys for Plaintiff
United States of America

KENNER LAW FIRM, APC

/s/ Brett A. Greenfield

By: _____
Brett A. Greenfield, Esq.
Attorneys for Defendant Michael
Grayson

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA

3 COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I
5 am over the age of 18 and not a party to the within action; my
6 business address is:

6 KENNER LAW FIRM, APC
16633 Ventura Boulevard, Suite 800
7 Encino, CA 91436
818 995 1195
8 818 475 5369 - fax

9 On September 8, 2011, I served the foregoing document described as
10 Stipulation to Continue Sentencing, on the interested parties by:

11 SEE ATTACHED SERVICE LIST

12 _____ BY MAIL - I deposited such envelope in the mail
13 at Los Angeles County, California. The envelope was mailed with
14 postage thereon fully prepaid.

15 x BY CM/ECF NOTICE OF ELECTRONIC FILING - I caused
16 said document(s) to be served by means of this Court's electronic
17 transmission of the Notice of Electronic Filing through the Court's
18 transmission facilities, to the parties and/or counsel who are
19 registered CM/ECF users set forth in the service list obtained from
20 this Court.

21 _____ I am "readily familiar" with the firm's practice of
22 collection and processing correspondence for mailing. Under that
23 practice, it would be deposited with the U.S. Postal Service on
24 that same day with postage thereon fully prepaid at Los Angeles
25 County, California in the ordinary course of business. I am aware
26 that on motion of the party served, service is presumed invalid if
27 postal cancellation date or postage meter date is more than one day
28 after date of deposit for mailing in affidavit.

22 _____ (STATE) I declare under penalty of perjury under the
23 laws of the State of California that the above is true and correct.

24 _____ (FEDERAL) I declare that I am employed in the office
25 of a member of the bar of this Court at whose direction the service
26 was made.

27 EXECUTED under penalty of perjury this 8th day of September,
28 2011, at Encino, California.

/s/ Brett A. Greenfield
Brett A. Greenfield, Esq.

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LIST OF PARTIES SERVED
Via Electronic Service and US Mail
JENNIFER L. WAIER
Assistant United States Attorney
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