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Attorney for Defendant
Irene Pemkova

## UNITED STATES DISTRICT COURT

## CENTRAL DISTRICT OF CALIFORNIA

### SOUTHERN DIVISION

| | |
|---|---|
| UNITED STATES OF AMERICA,<br><br>            Plaintiff,<br><br>    vs.<br><br>IRENE PEMKOVA,<br><br>            Defendant | )  Case No.: SA CR 08-180-DOC<br>)<br>)  EX PARTE APPLICATION TO CHANGE<br>)  TRAVEL DATES<br>)<br>)<br>)<br>)<br>)<br>) |

Defendant, Irene Pemkova, by and through her attorney of record, hereby applies to this court ex parte for an order changing her travel dates from March 10, 2009 to April 10, 2009 to April 15, 2009 to May 15, 2009 so that she may obtain medical treatment.  This request is based on the attached declaration, the records on file in this case and any argument that may be necessary.

Dated: April 6, 2009                                Respectfully submitted,


                                                    _____/s/_____
                                                    Diane C. Bass
                                                    Attorney for Defendant
                                                    Irene Pemkova

I, Diane C. Bass, declare as follows:

1.      I am an attorney at law, duly licensed to practice in the Central District of California. I am the appointed attorney of record for defendant, Irene Pemkova.

2.      On February 25, 2009, this Honorable Court granted defendant permission to travel to the Czech Republic in order to obtain medical treatment.  Defendant was to travel from March 10, 2009 to April 10, 2009.

3.      Defendant was unable to travel on those dates for numerous reasons.  Defendant reports that the chief of the medical facility was not available to treat her during those dates.  Defendant further reports that she was unable to purchase tickets or reserve a car until her passport was returned to her. Additionally, the G-20 summit and the Easter holiday made travel almost impossible during this time.

4.      Defendant his hereby requesting that she be permitted to travel from April 15, 2009 to May 15, 2009 rather than from March 10, 2009 to April 10, 2009 as previously ordered.

Dated:  April 6, 2009                                              Respectfully submitted,


                                                            _____/s/ Diane C. Bass_____
                                                            Diane C. Bass
                                                            Attorney for Defendant
                                                            Irene Pemkova

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

| | |
|---|---|
| UNITED STATES OF AMERICA, | ) Case No.: SA CR 08-180-DOC |
| | ) |
| Plaintiff, | ) [PROPOSED] ORDER CHANGING |
| | ) TRAVEL DATES |
| | ) |
| vs. | ) |
| | ) |
| IRENE PEMKOVA, | ) |
| | ) |
| Defendant | ) |

IT IS SO ORDERED THAT Good Cause Having Been Found, defendant may travel to

the Czech Republic for medical treatment from April 15, 2009 to May 15, 2009 rather than

March 10, 2009 to April 10, 2009 as previously ordered.   Defendant's passport shall be returned

to Pretrial Services upon her return, no later than May 18, 2009.


Dated:  April 6, 2009                                    _____

                                                        HONORABLE DAVID O. CARTER