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7 Attorney for Defendant  
8 Irene Pemkova

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 SOUTHERN DIVISION

12 UNITED STATES OF AMERICA, ) Case No.: SA CR 08-180-DOC  
13 )  
14 Plaintiff, ) STIPULATION PERMITTING  
15 ) DEFENDANT TO TRAVEL FOR MEDICAL  
16 vs. ) TREATMENT; RETURN OF PASSPORT  
17 ) AND DECLARATION.  
18 IRENE PEMKOVA, )  
19 )  
20 Defendant )

21 Defendant, Irene Pemkova, by and through her attorney of record, Diane C. Bass, and the  
22 United States by and through Assistant United States Attorney Lawrence Kole hereby stipulate  
23 as follows:

- 24 1. On February 25, 2009, this Honorable Court granted defendant permission to travel to the  
25 Czech Republic in order to obtain medical treatment. Defendant was to travel from March 10,  
26 2009 to April 10, 2009.
2. Based on defendant's representations that she was unable to travel on those dates for  
numerous reasons the court granted defendant permission to travel from April 15, 2009 to May  
15, 2009 rather than from March 10, 2009 to April 10, 2009 as previously ordered.
3. Defendant was in possession of her passport from early March through Mid-May.

2 4. Defendant requests to be permitted to travel to the Czech Republic to receive medical  
3 treatment for the reasons described in the declaration of counsel attached hereto.

4 5. Defendant reports that she is currently on four waiting lists with various airlines waiting  
5 for a ticket to travel to the Czech Republic and that she has to coordinate her travel dates with  
6 her doctors and the clinic where she receives treatment. Therefore, the parties hereby stipulate  
7 that upon receipt of her airline ticket, defense counsel will provide defendant's dates of travel to  
8 the government and file it with the court. Defense counsel will provide defendant's itinerary to  
9 pretrial services as soon as defendant obtains her ticket. The parties further stipulate that  
10 defendant be permitted to obtain her passport from pretrial services as soon as she obtains her  
11 ticket.

12 6. Defendant's conditions of bond shall be modified so that she is to return her passport to  
13 pretrial services in Santa Ana within 4 days of returning to the United States.

14  
15 Dated: July 14, 2009

\_\_\_\_\_/s/\_\_\_\_\_  
Diane C. Bass  
Attorney for Defendant  
Irene Pemkova

16  
17  
18 Dated: July 14, 2009

\_\_\_\_\_/s/\_\_\_\_\_  
Lawrence Kole  
Assistant United States Attorney  
United States of America

**DECLARATION**

I, Diane C. Bass declare as follows:

1. I am an attorney at law duly licensed to practice law in the Central District of California.

I am the appointed attorney of record for the defendant in this case.

2. Defendant is a citizen of the Czech Republic and resides in the United States as a resident alien.

3. Defendant reports that she suffers from multiple life threatening conditions for which she was being treated in Brno, Czech Republic just prior to her arrest in this case.

4. Defendant further reports that she is indigent and is not covered by any form of health insurance in the United States. She is however, covered by the health system in the Czech Republic.

5. Defendant has returned to the United States after receiving treatment from April 2009 to May 2009 and she reports that the infection has caused damage to all of her vital organs. She therefore needs to return for further treatment.

6. Defendant further reports that due to her allergies, defendant is unable to receive treatment in the ordinary fashion but rather must wait several days to a week between treatments so that she does not have an allergic reaction to the treatments. She therefore, requires 60 days for treatment.

Dated: July 14, 2009

\_\_\_\_\_  
/s/  
Diane C. Bass

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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 SOUTHERN DIVISION

12 UNITED STATES OF AMERICA, ) Case No.: SA CR 08-180-DOC  
13 )  
14 Plaintiff, ) [PROPOSED] ORDER GRANTING  
15 ) DEFENDANT IRENE PEMKOVA  
16 vs. ) PERMISSION TO TRAVEL TO THE  
17 ) CZECH REPUBLIC FOR MEDICAL  
18 ) TREATMENT  
19 IRENE PEMKOVA, )  
20 )  
21 Defendant )

22 IT IS SO ORDERED THAT Good Cause Having Been Found, defendant may travel to  
23 the Czech Republic for medical treatment for sixty days. Defendant shall provide her travel  
24 dates to her counsel immediately upon receipt of said dates. Defense counsel shall provide that  
25 information to government counsel, file it with the court and provide it along with defendant's  
26 itinerary to pretrial services.

IT IS FURTHER ORDERED that defendant's passport shall be returned to her by pretrial  
services as soon as she receives her airline tickets. Defendant's conditions of bond shall be  
modified so that she shall return her passport to pretrial services in Santa Ana within four days of

2 her return to the United States rather than returning it to pretrial services in Las Vegas within 48  
3 hours.

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5 Dated:

HONORABLE DAVID O. CARTER

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