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7 Attorney for Defendant, BEATA PRIORE

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA	}	CASE NO. SA-CR-08-180-DOC
11 Plaintiff,	}	
12 vs.	}	
13 BEATA PRIORE	}	SUBMISSION OF DOCUMENTS IN SUPPORT OF WAIVER OF PRESENCE OF DEFENDANT PRIORE FOR STATUS CONFERENCE OF MARCH 12, 2013
14 Defendant.	}	

15 Defendant Beata Priore, by and through her attorney of record, Joel Levine,
16 respectfully requests that the Court approve a waiver of her presence for the status
17 conference just ordered, on March 7, 2013, to be held March 12, 2013 at 9:00 a.m.
18 As reflected in the attached email from Ms. Priore, traveling on such short notice
19 from New York for this status conference will create an undue burden both
20 financially (in having to purchase another airline ticket on short notice in addition
21 to the one for the trial) and on the care of her 89 year old mother for whom she
22 cares at her residence. Also attached hereto is a Waiver of Presence Form
previously submitted by Ms. Priore in this case, which is part of the Court file

23 Dated: March 8, 2013

Respectfully submitted,
24 JOEL LEVINE, Esq.
A Professional Corporation

25
26 By s/ _____
27 JOEL LEVINE, Esq.
Attorneys for Defendant
28 BEATA PRIORE

Joel Levine

From: <priore@maxfoundation.us>
Date: Thursday, March 07, 2013 6:13 PM
To: "Joel Levine" <jlesquire@cox.net>
Subject: RE: Fw: Activity in Case 8:08-cr-00180-DOC USA v. Onciu et al Minutes of In Chambers Order/Directive - no proceeding held

Dear Joel,

This is absolutely impossible to get done, One I have a 89 yr old mother here with me, who needs to be cared for, Two I have to get someone in and I can only get them for the 19th and on, we were on Schedule for the 26th of March and Before that April 2nd, This put me in so much hardship, that I cannot even get another ticket out there this fast. Please see what you can do for me to delay this a week until my mom who is mostly blind, and we can get someone here.

Third,

Joel I have no more money to get a ticket, I will need some assistance here too, my next funds will be the last Wednesday of each month.

these cheap tickets and hotel / car combo are not refundable or exchangeable.

Appreciate you and thank you in advance...

Beata

----- Original Message -----

Subject: Fw: Activity in Case 8:08-cr-00180-DOC USA v. Onciu et al Minutes of In Chambers Order/Directive - no proceeding held

From: "Joel Levine" <jlesquire@cox.net>

Date: Thu, March 07, 2013 7:50 pm

To: "Beata Priore" <priore@maxfoundation.us>

Please find the order from this afternoon about a status conference on 3/12 at 9AM.

Joel

From: cacd_ecfmail@caed.uscourts.gov

Sent: Thursday, March 07, 2013 3:26 PM

To: ecfnef@caed.uscourts.gov

Subject: Activity in Case 8:08-cr-00180-DOC USA v. Onciu et al Minutes of In Chambers Order/Directive - no proceeding held

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

United States of America,

Plaintiff(s)

v.

BEATA GIZELLA PRIORE

Defendant(s)

CASE NUMBER:

SACR 08-180-DOC

WAIVER OF DEFENDANT'S PRESENCE

(Rule 43, Federal Rules of Criminal Procedure)

The undersigned defendant hereby waives the right to be present in person in open court upon hearing of any motion in this cause, including the time that the case is ordered set for trial, when a continuance is ordered, or when any other action is taken by the Court before, during, or after trial; except upon arraignment, plea, impanelment of a jury and imposition of sentence.

The undersigned defendant requests the Court to proceed during every absence of his which the Court may permit pursuant to this waiver; agrees that his interests will be deemed represented at all times by the presence of his attorney, the same as if the defendant himself was personally present in court; and further agrees to be present in person in court ready for trial on any day and hour which the Court may fix in his absence.

Date: January 27th 2012

Signature of Defendant

Glen Head, New York, 11545

City, State, Zip Code

646-556-5320

Telephone Number

Please check here if this is a change of address.

Date: 1/27/2012

s/Joel Levine

Attorney for Defendant

WAIVER OF DEFENDANT'S PRESENCE
(Rule 43, Federal Rules of Criminal Procedure)