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UNITED STATES DISTRICT COURT

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CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION

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(HONORABLE DAVID O. CARTER)

11 UNITED STATES OF AMERICA,)

Case No. 08CR0180-DOC

12 Plaintiff,)

**STIPULATION CONTINUING
DEFENDANT MOSES ONCIU'S
SURRENDER DATE FROM MAY 1
TO AUGUST 15, 2014**

13 v.)

14 MOSES ONCIU (1),)

15 Defendant.)

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18 Defendant Moses Onciu, by and through his counsel of record, Jennifer L. Coon, and
19 Plaintiff United States of America, by and through its counsel of record, Assistant United
20 States Attorney Lawrence E. Kole, stipulate as follows:

21 1. Defendant Moses Onciu first appeared before a judicial officer in the court in
22 which this charge is pending on August 4, 2008. He was released on a \$20,000 appearance
23 bond. He was subsequently supervised by United States Pretrial Services (USPTS). He
24 appeared for all court proceedings as directed, and according to USPTS, he complied with the
25 terms of his pretrial release.

26 2. On April 10, 2013, the Court discontinued pretrial supervision, and modified Mr.
27 Onciu's permitted travel to allow travel within the United States. Mr. Onciu continued to
28 appear for all court proceedings as directed.

1 3. On January 27, 2014, Mr. Onciu was sentenced to a term of 12 months and one
2 day in custody, to be followed by two years of supervised release. He was ordered to
3 surrender on or before 12 noon on May 1, 2014. Mr. Onciu is currently living at his home in
4 Fountain Hills, Arizona, pending his surrender.

5 4. Mr. Onciu seeks a continuance of his surrender date from May 1 to August 15,
6 2014, for the following reasons. Mr. Onciu is intending to file a motion for bond pending
7 appeal. Mr. Onciu is currently represented by appellate counsel, appointed pursuant to the
8 Criminal Justice Act, but appellate counsel was not the counsel before the district court. Mr.
9 Onciu's counsel needs to obtain and review the transcripts in this case before she can research
10 and draft any bond motion. The transcripts have been ordered and are due on June 2, 2014.
11 Accordingly, Mr. Onciu requests that his surrender date be extended in order to allow his
12 counsel sufficient time to review the transcripts in the case, to consider the possible grounds
13 for a motion for bond pending appeal and, if necessary, to prepare and file such a motion, and
14 to obtain a ruling from this Court and, if necessary, seek review in the Ninth Circuit, prior to
15 Mr. Onciu's surrender.

16 5. In view of Mr. Onciu's appearances and compliance with the terms of his
17 release, and the reasons for defense counsel's request, the government does not object to the
18 proposed extension of Mr. Onciu's surrender date.

19 IT IS SO STIPULATED.
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21

22 DATED: April 8, 2014

s/ Jennifer L. Coon
Attorney for Defendant Moses Onciu

24 DATED: April 8, 2014

s/ Lawrence E. Kole
Assistant United States Attorney
By telephonic and e-mail authorization

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION
(HONORABLE DAVID O. CARTER)

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
) v.)
) MOSES ONCIU (1),)
) Defendant.)

Case No.: 08CR0180-DOC

**[PROPOSED] ORDER CONTINUING
DEFENDANT MOSES ONCIU'S
SURRENDER DATE FROM MAY 1 TO
AUGUST 15, 2014**

The Court has read and considered the stipulation to continue surrender date for defendant Moses Onciu filed by this parties in this matter on April 8, 2014.

FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED that defendant Moses Onciu's surrender date shall be postponed from May 1, 2014, to 12 noon on August 15, 2014.

SO ORDERED.

Dated: _____

HONORABLE DAVID O. CARTER
United States District Judge