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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOEL BARRY GILLIS, and
EDWARD WISHNER,

Defendants.

No. CR 14-712-SJO

GOVERNMENT'S PARTIAL OPPOSITION TO
DEFENDANTS GILLIS AND WISHNER'S
JOINT EX PARTE APPLICATION TO
CONTINUE SENTENCING

Hearing Date: [None requested]

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorney Ranee A. Katzenstein, hereby files its Partial Opposition to Defendants Joel Barry Gillis and Edward Wishner's Joint Ex Parte Application to Continue Sentencing of both defendants. The government's partial opposition is based upon the attached declaration of Ranee A. Katzenstein, the files and records in this case, and such further evidence and argument as the Court may permit.

For the reasons set forth in detail in the Katzenstein declaration, the government does not oppose a ten-week continuance of

1 the sentencing hearing to September 28, 2015, in order to afford
2 defendants the opportunity to review the government's loss analysis
3 and to formulate their own position regarding loss and other
4 sentencing factors. However, the government does oppose defendants'
5 request for the significantly more lengthy six-month continuance they
6 seek, principally because the more lengthy continuance will serve
7 only to delay the proceedings and to impair the rights of victims to
8 have the Court and the Receiver address the full scope of their
9 losses in a timely manner.

10 Dated: May 22, 2015

Respectfully submitted,

11 STEPHANIE YONEKURA
12 Acting United States Attorney

13 ROBERT E. DUGDALE
14 Assistant United States Attorney
Chief, Criminal Division

15 /s/ Rance A. Katzenstein
16 RANEE A. KATZENSTEIN
Assistant United States Attorney

17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA
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