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9	UNITED STATES OF AMERICA	
10	UNITED STATES DISTRICT COURT	
11	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
1.0		
12	UNITED STATES OF AMERICA,	No. CR 14-712-SJO
13	Plaintiff,	GOVERNMENT'S PARTIAL OPPOSITION TO
	,	DEFENDANTS GILLIS AND WISHNER'S
14	v.	RENEWED JOINT EX PARTE APPLICATION
15	JOEL BARRY GILLIS, and	TO CONTINUE SENTENCING
13	EDWARD WISHNER,	Hearing Date: [None requested]
16		
	Defendants.	
17		
18	Plaintiff United States of Am	merica, by and through its counsel
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19	of record, the United States Attorney for the Central District of	

of record, the 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 Renewed 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 four-week continuance

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of the sentencing hearing to October 19, 2015, in order to afford defendants the opportunity to review financial records recently produced to defendants and to prepare for sentencing. However, the government does oppose defendants' request for the significantly more lengthy three-month continuance they seek, principally because the more lengthy continuance will serve only to delay the proceedings and to impair the rights of victims to have the Court and the Receiver address the full scope of their losses in a timely manner. Dated: August 19, 2015 Respectfully submitted, EILEEN M. DECKER United States Attorney LAWRENCE S. MIDDLETON Assistant United States Attorney Chief, Criminal Division /s/Ranee A. Katzenstein RANEE A. KATZENSTEIN Assistant United States Attorney Attorneys for Plaintiff UNITED STATES OF AMERICA