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Attorney for Defendant, Fred Magaña

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA (THE HONORABLE BERNARD G. SKOMAL)

UNITED STATES OF AMERICA,

Case No. 19CR4768-GPC (bgs)

Plaintiff,

v.

FRED MAGAÑA,

UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE TO PERMIT TRAVEL

Defendant.

TO: RANDY S. GROSSMAN, ACTING UNITED STATES ATTORNEY; ANDREW R. HADEN AND NICHOLAS W. PILCHAK, ASSISTANT UNITED STATES ATTORNEYS; LUCAS GRAVELL, U.S. PRETRIAL SERVICES OFFICER:

Fred Magaña (Mr. Magaña), by and through his counsel, Ezekiel E. Cortez, hereby moves this Court to modify his bond conditions to permit him to travel to Redondo Beach, California on June 27, 2022, for an important personal matter. Assistant United States Attorneys Andrew R. Haden and Nicholas W. Pilchak were contacted and do not oppose this request. Mr. Magaña's supervising pretrial services officer, Officer Jojemary Rojo, does not have an objection to the travel. Yamina G. Huertas, Mr. Magaña's wife and surety, supports this request as well.

Magaña remains entirely compliant with all his bond conditions and has demonstrated his trustworthiness while on pretrial release. He has been incident-free on bail for over two and one half years - since November 22, 2019. He will provide additional details of this travel, including the address to where he is headed, to his pretrial services officer and will keep her informed if there are any changes.

CONCLUSION

For the above reasons, Fred Magaña respectfully asks this Court to modify his bond conditions to allow him to travel to Redondo Beach, California on June 27, 2022.

Respectfully submitted,

Date: June 22, 2022 /s/ Ezekiel E. Cortez

Ezekiel E. Cortez Attorney for Defendant, Fred Magaña

|s| Indrew R. Haden (by consent)

Andrew R. Haden Assistant U.S. Attorney