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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,

Plaintiff,

v.

FRED MAGAÑA,

Defendant.

Case No. 19CR4768-GPC (bgs)

**UNOPPOSED MOTION TO
 MODIFY CONDITIONS OF
 PRETRIAL RELEASE TO PERMIT
 TRAVEL**

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 July 6, 2022, for follow-up on 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.

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Unopposed Motion to Modify Bond Conditions to Permit Travel,
 U.S. v. Fred Magaña, Case No. 19CR4768-GPC (bgs)

1 As noted before, Mr. Magaña continues to remain entirely compliant with all his
2 bond conditions and has demonstrated his trustworthiness while on pretrial release. He
3 has been incident-free on bail for over two and one half years - since November 22,
4 2019. He will provide additional details of this travel, including the address to where he
5 is headed, to his pretrial services officer and will keep her informed if there are any
6 changes.

7 **CONCLUSION**

8 For the above reasons, Fred Magaña respectfully asks this Court to modify his
9 bond conditions to allow him to travel to Redondo Beach, California on July 6, 2022.

10 Respectfully submitted,

11 Date: June 29, 2022

12 /s/ Ezekiel E. Cortez
13 Ezekiel E. Cortez
14 Attorney for Defendant,
15 Fred Magaña

16 /s/ Andrew R. Haden (by consent)
17 Andrew R. Haden
18 Assistant U.S. Attorney