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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
INCLUDE MODIFICATION TO
CONDITION 9, TO ALSO ALLOW
PERMISSION TO TRAVEL TO
THE CENTRAL DISTRICT OF
CALIFORNIA.**

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 bond Condition 9 to also allow him to travel to the Central District of California, for follow-ups on a 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, also does not have an objection to this modification of conditions of release. Yamina G. Huertas, Mr. Magaña's wife and surety, embraces this request as well.

*Unopposed Motion To Modify Conditions Of Pretrial Release To
Include Permission to Travel To The Central District Of California,
U.S. v. Fred Magaña, Case No. 19CR4768-GPC (bgs)*

1 Mr. Magaña has continued to remain entirely compliant with all his bond
 2 conditions and has demonstrated his trustworthiness while on pretrial release. He has
 3 been incident-free on bail since November 22, 2019.

4 **CONCLUSION**

5 For the above reasons, Fred Magaña respectfully asks this Court to modify his
 6 bond condition Number 9 to expand permission to travel to the Central District of
 7 California.

8 Respectfully submitted,

9 Date: July 9, 2022

10 /s/ Ezekiel E. Cortez
 11 Ezekiel E. Cortez
 12 Attorney for Defendant,
 13 Fred Magaña

14 /s/ Andrew R. Haden (by consent)
 15 Andrew R. Haden
 16 Assistant U.S. Attorney