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Attorneys for Defendants
 Carl Bradley Johansson and
 Western Distribution, LLC

UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No.: 21-CR-170-VAP
	)	
Plaintiff,	)	STIPULATION AND REQUEST TO
	)	CONTINUE SENTENCING
vs.	)	
	)	[PROPOSED ORDER FILED
	)	SEPARATELY]
WESTERN DISTRIBUTION, LLC., and	)	
CARL BRADLEY JOHANSSON,	)	Current Hearing Date: 5/9/2022 at 9:00a.m.
	)	
Defendants.	)	Proposed Hearing Date: 8/22/2022 at 9:00 a.m.
	)	

Defendants Carl Bradley Johansson (“Johansson”) and Western Distribution, LLC (“Western”), by and through their counsel of record, Mark J. Werksman and Karen M. Sosa, and 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 Attorneys Joseph Johns and Matthew O’Brien, hereby stipulate and request that the Court continue the sentencing in this matter from May 9, 2022 to August 22, 2022. This continuance is requested for the following reasons:

1. On September 29, 2021, defendants Johansson and Western pleaded guilty pursuant to a plea agreement with the government, and at that time the Court set a sentencing

1 hearing date of May 9, 2022. This is the parties' first request for a continuance of the
2 sentencing.

- 3 2. Defendants Johansson and Western received the Pre-Sentence Investigation Report
4 from Probation on April 4, 2022.
- 5 3. Defendant Johansson notified his counsel of record on April 10, 2022 that he wishes
6 to retain new counsel for himself and Western.
- 7 4. Therefore, counsel for Johansson and Western will need time either to resolve this
8 conflict or for new counsel to prepare for the sentencing.
- 9 5. The parties therefore stipulate and request that the Court continue the sentencing in
10 this matter from May 9, 2022 to August 22, 2022.
- 11 6. The parties also seek to continue the deadline for submitting objections to the
12 Presentence Report and sentencing position papers from April 18, 2022 to August 1,
13 2022.

14 IT IS SO STIPULATED.

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16 DATED: April 12, 2022

Respectfully submitted,

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20 Mark J. Werksman
21 Karen M. Sosa
22 Attorneys for Defendants
23 CARL BRADLEY JOHANSSON and
24 WESTERN DISTRIBUTION, LLC.

25
26 DATED: April 12, 2022

27 /s/

28 Joseph Johns
Matthew O'Brien
Assistant United States Attorneys
Attorneys for Plaintiff
UNITED STATES OF AMERICA