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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. KEITH LAWRENCE MIDDLEBROOK, Defendant.	No. 20-mj-1341 GOVERNMENT'S STATUS REPORT RE: REVIEW/RECONSIDERATION OF ORDER SETTING CONDITIONS OF RELEASE

The United States of America, by and through its counsel of record, Assistant United States Attorneys Valerie L. Makarewicz and James C. Hughes, hereby submit the following status report to the Court:

1. On March 25, 2020, the United States filed a complaint against defendant, charging him with a violation of 18 U.S.C. § 1349, attempted wire fraud. CR 1.
2. Defendant was arrested on March 25, 2020 and made his initial appearance before the Court on March 26, 2020. CR 4.

3. On March 27, 2020, the Court granted defendant pretrial release upon the posting of a $150,000 bond secured by an affidavit of surety signed by defendant's mother, with $50,000 of that amount to be secured by real property held by defendant's mother. CR 10.

4. As of the filing of this report, defendant has not posted the entirety of the bond with respect to amount secured by defendant's mother's property, and remains in custody. On April 30, 2020, defendant filed an Affidavit of Sureties by surety Martha Middlebrook in the amount of $100,000. CR 25.

5. On April 28, 2020, defendant filed an application for review/reconsideration of the above-mentioned bond order and requested to be released forthwith, pending the execution of the property bond. CR 23.

6. On April 29, 2020, the Court ordered that the government file its opposition to defendant's above-mentioned application by May 4, 2020 at noon. CR 24.

7. On May 1, 2020, counsel for the parties discussed the resolution of defendant's above-mentioned application, and have come to an agreement, in principle. Counsel for defendant, however, has not been able to discuss the agreement with defendant. Defendant regularly telephones counsel, and counsel is awaiting his call to discuss the proposed stipulation.

8. The government requests that the Court continue the government's time to oppose the above-mentioned application by two days, until Wednesday, May 6, 2020. If the parties can stipulate to resolve defendant's application after consulting defendant, which seems likely, the parties will file a

stipulation by such time for the Court's review. If the parties are unable, the government will file its opposition by May 6, 2020.

9. Counsel for defendant does not object to this proposal.

Dated: May 4, 2020

Respectfully submitted,

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/s/
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