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Attorney for Defendant
WILLIAM NGUYEN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. WILLIAM NGUYEN, Defendant.	No. CR 24 00555 SI APPLICATION FOR ORDER AND PROPOSED ORDER TO WITHDRAW GUILTY PLEA PURSUANT TO TERMS OF PLEA AGREEMENT WITHOUT OPPOSITION FROM THE GOVERNMENT

COMES NOW DEFENDANT WILLIAM NGUYEN, by and through undersigned Counsel, who respectfully requests permission to withdraw his previous entered guilty plea in the present charged matter. This request is made pursuant to the terms of the Plea Agreement (Docket #20) as all requirements of the LEADS program have been satisfied as has been confirmed by the Status Memorandum recently submitted by United States Pre Trial Services dated June 1, 2026 (Docket #33). The Government was informed Counsel that it has no objection to this request. Counsel so states under penalty of perjury.

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Dated: June 10, 2026

Respectfully Submitted,

LAW OFFICES OF HARRIS B. TABACK

By:_____//HBT//_____

HARRIS B. TABACK
Attorney for Defendant WILLIAM NGUYEN

[PROPOSED] ORDER

GOOD CAUSE APPEARING, AND WITHOUT OBJECTION, IT IS HEREBY ORDERED THAT the previously entered plea of guilty is set aside. The Court anticipates that The United States, according to the terms of the Plea Agreement and upon successful completion of the LEADS Program, will file a motion to dismiss the indictment with prejudice.

Dated: June_____, 2026

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THE HONORABLE SUSAN ILLSTON
UNITED STATES MAGISTRATE JUDGE