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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. GURJEET BATH, Defendant.	CASE NO. 1:24-CR-00198-001 STIPULATION AND [PROPOSED] ORDER TO CONTINUE SENTENCING HEARING Sentencing: January 26, 2026

DEFENDANT, GURJEET BATH's Sentencing Hearing is currently scheduled for January 26, 2026. The parties request a continuance of Sentencing in this matter, so that matters related to restitution can be investigated and addressed, prior to sentencing.

WHEREAS this matter is a PPP fraud case, where the dollar loss and the fact of restitution are dispositive issues.

WHEREAS Defendant has circulated proof of payment to the SBA by way of cancelled/deposited checks to the Government, over a month ago. The Government made every effort to confirm the fact of payments, via the SBA, and the parties worked together to get this verified.

WHEREAS the PSR has been prepared without reference for or consideration of restitution having been paid in full.

WHEREAS only today the SBA has confirmed to the Government that full restitution has been paid.

WHEREAS the fact that restitution has been paid in full is dispositive as to sentencing, and needs to be considered by Probation and addressed by the Defense in informal objections and the interactive process attendant to the final PSR and recommendations for a variance or departure from sentencing guidelines.

WHEREAS Defendant's counsel needs to be afforded opportunity to respond to the Final PSR (after the interactive process of informal and formal objections), and submit a sentencing brief; this is not practicable with the Sentencing as currently set.

WHEREAS in light of the above, request is made for a continuance of the January 26, 2026, Sentencing hearing for a period of 60 days.

WHEREAS the Parties request a renewed Sentencing Referral Schedule be issued, based on the continued sentencing date, for any informal and formal objections and sentencing brief due dates.

WHEREAS it is understood that the Defense does not intend to request any further continuances of sentencing attendant to this restitution issue, or otherwise without new or otherwise good cause.

THEREFORE, IT IS STIPULATED by and between the Parties that the January 26, 2026, Sentencing hearing be continued to March 23, 2026, or to a date convenient to the Court.

IT IS SO STIPULATED:

Dated: January 8, 2026

ERIC GRANT
United States Attorney

By: /s/ Joseph Barton
JOSEPH BARTON
Assistant United States Attorney

Dated: January 8, 2026

BONAKDAR LAW FIRM

By: /s/ Roger S. Bonakdar
ROGER S. BONAKDAR
Attorney for Defendant
GURJEET BATH

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ORDER

Upon the Parties' stipulation and for good cause shown, Defendant, GURJEET BATH's Sentencing Hearing is continued from January 26, 2026, to March 23, 2026, at 9:00 a.m. The Clerk shall issue a new schedule for informal and formal objections and sentencing briefs to be due, based on the continued sentencing date.

All orders not expressly modified by this order remain in full force and effect.

IT IS SO ORDERED.

Dated: _____

_____
HON. JENNIFER L. THURSTON
UNITED STATES DISTRICT JUDGE