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8
9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14
15 v.
16 KEITH FOSTER ET AL.,
17
18 Defendants.

CASE NO. 1:15-CR-00104 AWI
STATUS REPORT

18 The United States of America, by and through Benjamin B. Wagner, United States Attorney, and
19 Melanie L. Alsworth, Assistant United States Attorney, submits the following status report in
20 accordance with the Magistrate Judge's order of February 3, 2016.

21 1. Discovery

22 On March 9, 2016, the government provided supplemental discovery to the defense, bates
23 numbers 036470-036507, including supplemental reports and transcripts. The defendants were also
24 notified on this date that discovery from electronic devices is available, and the government requested
25 that any defendant wanting a copy of the discoverable information provide an external hard drive upon
26 which to copy the data. Only one defendant has requested a copy of this information and provided a
27 hard drive. The hard drive was received on March 31, 2016. The government will provide this
28 discovery to the defendant as soon as practicable.

1 2. Plea Offers

2 Plea offers were made to the following defendants: Ricky Reynolds (on or about July 13, 2015);
3 Randy Flowers (on or about September 1, 2015), and Rafael Guzman (on or about November 27, 2015).
4 Plea offers to defendants Keith Foster, Iran Dennis Foster and Jennifer Donabedian are being finalized
5 and will be sent no later than April 15, 2016. Sarah Ybarra entered a plea of guilty on November 23,
6 2015.

7 Respectfully submitted,

8 Dated: April 4, 2016

 BENJAMIN B. WAGNER
 United States Attorney

10 s/ Melanie L. Alsworth
11 MELANIE L. ALSWORTH
 Assistant United States Attorney

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