

FLORENCE T. NAKAKUNI #2286
UNITED STATES ATTORNEY
District of Hawaii

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division

DANIEL H. WEISS
Trial Attorney
United States Department of Justice
Civil Rights Division
Criminal Section
Human Trafficking Prosecution Unit
601 D Street N.W.
Washington, DC 20530
Telephone: (202) 514-3204
Facsimile: (202) 514-6588

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 09-00338 SOM
)	
Plaintiff,)	JOINT MOTION FOR ADDITIONAL
)	TIME FOR UNITED STATES
vs.)	TO FILE POSITION REGARDING
)	RESTITUTION AND SENTENCE;
MATEE CHOWSANITPHON,)	CERTIFICATE OF SERVICE
)	
Defendant.)	
)	

**JOINT MOTION FOR ADDITIONAL TIME FOR UNITED STATES TO FILE
POSITION REGARDING RESTITUTION AND SENTENCE**

COMES NOW the United States, by and through its undersigned counsel, and Defendant Matee Chowsanitphon, by and through his undersigned counsel, and jointly move this Court to allow an additional two weeks for the United States to file its

position regarding the restitution and sentence in the above matter. In support of this joint motion, the parties aver as follows:

(1) On August 12, 2011, the United States filed a motion requesting that the Court hold in abeyence the restitution ordered in this case. (Dkt. No. 24)

(2) On August 22, 2011, the Court granted the United States' motion and ordered that the restitution be held in abeyence and that the United States file a motion or statement setting forth its position regarding restitution and sentence on or before September 7, 2011. (Dkt. No. 25)

(3) On September 2, 2011, undersigned counsel, Assistant United States Attorney Susan Cushman and Rustam Barbee, counsel for the defendant, met to discuss the matters of restitution and sentencing.

(4) The parties are working diligently and in good faith to address the above matters, but require additional time to confer.

//

//

//

//

//

//

//

(5) Accordingly, the parties respectfully request that the Court extend until September 21, 2011, the time for the United States to respond to the Court's order.

DATED: September 6, 2011 at Honolulu, Hawaii.

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division

By /s/ Daniel H. Weiss
DANIEL H. WEISS
Trial Attorney

/s/ Rustam Barbee
RUSTAM BARBEE
Attorney for Defendant
MATEE CHOWSANITPHON

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served Electronically through CM/ECF:

Rustam A. Barbee
1188 Bishop Street, Suite 2606
Honolulu, Hawaii 96813

Attorney for Defendant
MATEE CHOWSANITPHON

DATED: September 6, 2011, at Honolulu, Hawaii.

/s/ Dawn Aihara