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

SUSAN CUSHMAN Assistant United States Attorney

THOMAS E. PEREZ ASSISTANT ATTORNEY GENERAL Civil Rights Division

SUSAN FRENCH Senior Special Counsel KEVONNE SMALL Trial Attorney Human Trafficking Prosecution Unit Criminal Section Civil Rights Division 601 D Street, NW Washington, D.C. 20530 Telephone: (202) 514-3204

Attorneys for Plaintiff UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITI	ED STATES	S OF AMERICA	,)	CR. NO. 09-00345-02 SOM
)	
	Plaintiff,)	UNITED STATES' REPLY TO
)	DEFENDANTS MIKE AND ALEC SOU'S	
	vs.)	JOINT MOTION TO DETAIN
)	MATERIAL WITNESSES;
MIKE	MANKONE	SOU,	(02))	CERTIFICATE OF SERVICE
)	
	Defendant.)	
)	

UNITED STATES' REPLY TO DEFENDANTS MIKE AND ALEC SOU'S JOINT MOTION TO DETAIN MATERIAL WITNESSES

Comes now the United States of America, through undersigned counsel, and does not oppose Defendants Mike and Alec Sou's Joint Motion to Detain Material Witnesses (Dkt. No. 168, dated April 25, 2011) Thanakorn Mukdamuang and Kuson Thasak in order to secure and preserve their testimony by deposition for trial in this case set for July 27, 2011. On April 20, 2011, the United States learned of and immediately informed defense counsel that Mr. Mukdamuang and Mr. Thasak were granted voluntary departure, in lieu of deportation, in the immigration court of Honolulu, Hawaii. This information was communicated to defense counsel via telephone, electronic mail, and was produced in discovery.

DATED: April 29, 2011, at Honolulu, Hawaii.

FLORENCE T. NAKAKUNI United States Attorney District of Hawaii

By <u>/s/ Thomas J. Brady for</u> SUSAN CUSHMAN Assistant U.S. Attorney

THOMAS E. PEREZ Assistant Attorney General Civil Rights Division

/s/ Thomas J. Brady for SUSAN FRENCH Senior Special Counsel Kevonne Small Trial Attorney

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:

Thomas Otake, Esq. 345 Queen Street Suite 600 Honolulu, HI 96813

Attorney for Defendant MIKE MANKONE SOU

DATED: April 29, 2011, at Honolulu, Hawaii.

/s/ Dawn Aihara