

1 CUAUHTÉMOC ORTEGA (Bar No. 257443)  
Federal Public Defender  
2 CHARLES SNYDER (Bar No. 287247)  
Email: Charles\_Snyder@fd.org  
3 ADAM OLIN (Bar No. 298380)  
Email: Adam\_Olin@fd.org  
4 Deputy Federal Public Defenders  
321 E. 2nd Street  
5 Los Angeles, California 90012  
Telephone: (213) 894-2854  
6 Facsimile: (213) 894-0081

7 Attorneys for Defendant  
JOSE LUIS HUIZAR

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **WESTERN DIVISION**

12 UNITED STATES OF AMERICA,  
13 Plaintiff,  
14 v.  
15 JOSÉ LUIS HUIZAR,  
16 Defendant.

Case No. 20-CR-326-JFW-1

**UNOPPOSED EX PARTE  
APPLICATION TO CONTINUE  
SENTENCING HEARING AND  
RELATED DATES FROM  
DECEMBER 15, 2023 TO JANUARY  
26, 2024**

17  
18 Jose Huizar, through counsel, applies ex parte and without opposition to continue  
19 his sentencing date from December 15, 2023 to January 26, 2024. Huizar bases this  
20 application on the attached declaration of counsel, the files and records in this case, and  
21 any other evidence or argument that the Court may consider.

22  
23 Respectfully submitted,  
CUAUHTEMOC ORTEGA  
24 Federal Public Defender

25 DATED: October 23, 2023

By /s/ Charles J. Snyder

26 Charles J. Snyder  
27 Attorney for Jose Huizar  
28

1 **DECLARATION OF CHARLES J. SNYDER**

2 I, Charles J. Snyder, declare as follows:

3 1. I am a California-licensed DFPD appointed to represent Jose Huizar in this  
4 matter. I make this declaration based on personal knowledge and, if called as a witness,  
5 would attest to its contents under oath.

6 2. Mr. Huizar changed his plea on January 20, 2023, at which time the Court  
7 set an April 3, 2023 date for his sentencing. The Court previously granted two requests  
8 to continue the sentencing, first from April 3, 2023 to September 25, 2023, and later  
9 from September 25, 2023 to December 15, 2023.

10 3. I write to request an additional continuance from December 15, 2023 to  
11 January 26, 2024. The government offered to stipulate to these dates, but I am filing  
12 this request as an unopposed ex parte application, rather than a stipulation, because it  
13 includes information that only I know.

14 4. Until his change of plea, Mr. Huizar had three lawyers working on his  
15 case. Shortly after the change of plea, and for roughly six months between February  
16 and August 2023, I was the only lawyer working on this matter, which I was attempting  
17 to balance with other professional commitments.<sup>1</sup> In August 2023, Mr. Olin returned  
18 from his personal leave, but much of his time since returning has been consumed by a  
19 murder-for-hire case in which his client asserted his speedy-trial rights. Since  
20 September 2023, I have been on leave due to the birth of my child.

21 5. This is a large and complicated matter with significant public interest and  
22 potential sentencing exposure. The sentencing submissions (including the PSR) in this  
23 case will require lengthy and complex filings necessitating a significant expenditure of  
24 time and effort by counsel for all parties.

25 6. I am requesting a continuance because, due to professional commitments  
26 and personal life events, the defense needs more time than presently available under the  
27 schedule to gather letters, prepare a sentencing video, and draft the sentencing  
28

---

<sup>1</sup> Carel Ale is no longer counsel of record in this case. Adam Olin was on family leave from February through August.

1 submission, including a response to the yet-undisclosed PSR. I am also requesting a  
2 continuance for the reason discussed in my concurrently-filed sealed declaration.

3 7. I communicated with the government about this application; the  
4 government indicated that it neither opposes the substance of the application nor its ex  
5 parte nature. The government has indicated, however, that it will oppose further  
6 continuances beyond the requested January 26, 2024 date.

7  
8 I declare under penalty of perjury that the foregoing is true and correct to the best  
9 of my knowledge and belief. Executed October 23, 2023 at Los Angeles, California.

10  
11 /s/ Charles J. Snyder

12 Charles J. Snyder  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28