

1 JACKLIN CHOU LEM (Cal. Bar No. 255293)
MAY LEE HEYE (Cal. Bar No. 209366)
2 HOWARD J. PARKER (Wash. Bar No. 07233)
KELSEY C. LINNETT (Cal. Bar No. 274547)
3 Antitrust Division
U.S. Department of Justice
4 450 Golden Gate Avenue
Box 36046, Room 10-0101
5 San Francisco, CA 94102-3478
Tel: (415) 436-6660; Fax: (415) 436-6687
6 jacklin.lem@usdoj.gov

7 Attorneys for the United States

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA)

No. CR 11-0488 RS

14)
15 v.)

**JOINT REQUEST TO
EXCLUDE TIME FROM
DECEMBER 20, 2011 TO
JUNE 18, 2012**

16 EAGLE EYES TRAFFIC INDUSTRIAL CO., LTD.;)
17 E-LITE AUTOMOTIVE, INC.;)
18 HOMY HONG-MING HSU; and)
YU-CHU LIN, aka David Lin,)

19 Defendants.)
20

21 The defendant, Homy Hong-Ming Hsu, represented by Becky Walker James, and the
22 defendants Eagle Eyes Traffic Industrial Co., Ltd. (“Eagle Eyes”) and E-Lite Automotive, Inc.
23 (“E-Lite”), represented by Kenneth Julian, appeared before Magistrate Judge Joseph Spero on
24 December 20, 2011, for initial appearance and arraignment on the Superseding Indictment filed
25 November 30, 2011. Also on December 20, 2011, Mr. Hsu, Eagle Eyes, and E-Lite appeared
26 before Judge Richard Seeborg. During that appearance, trial in this matter was set for June 18,
27 2012.

28 //

1 The government and the defendants Mr. Hsu, Eagle Eyes, and E-Lite make a joint request
2 to exclude time under the Speedy Trial Act between December 20, 2011 and June 18, 2012, for
3 effective preparation of counsel to allow defense counsel time to review discovery and to
4 conduct necessary investigation to prepare for trial.

5 The defendants and the government agree that failing to exclude the time between
6 December 20, 2011 and June 18, 2012 would unreasonably deny the defendants and counsel the
7 reasonable time necessary for effective preparation, taking into account the exercise of due
8 diligence. 18 U.S.C. § 3161(h)(7)(B).

9 The defendants and the government agree that the ends of justice served by excluding the
10 time between December 20, 2011 and June 18, 2012 from computation under the Speedy Trial
11 Act outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. §
12 3161(h)(7)(A).

13
14
15 DATED: December 23, 2011

16 Respectfully submitted,

17
18
19 /s/ Becky Walker James
Becky Walker James
20 Counsel for Homy Hong-Ming Hsu

/s/ Jacklin Chou Lem
Jacklin Chou Lem
May Lee Heye
Howard J. Parker
Kelsey C. Linnett
Trial Attorneys
U.S. Department of Justice
Antitrust Division
450 Golden Gate Avenue
Box 36046, Room 10-0101
San Francisco, CA 94102

21
22 /s/ Kenneth Julian
Kenneth Julian
23 Counsel for Eagle Eyes Traffic
24 Industrial Co., Ltd. and E-Lite
25 Automotive, Inc.