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5 Attorney for Defendant  
 6 **HOMY HONG-MING HSU**

7 UNITED STATES DISTRICT COURT  
 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 9 SAN FRANCISCO DIVISION

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UNITED STATES OF AMERICA,  
 Plaintiff,  
 v.  
 HOMY HONG-MING HSU,  
 Defendant.

Case No. CR-11-0488-RS

**STIPULATION AND [PROPOSED]  
 ORDER MODIFYING  
 CONDITIONS OF PRETRIAL  
 RELEASE**

Hon. Nathanael Cousins, United States  
 Magistrate Judge

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Plaintiff United States of America, by and through its counsel of record, and defendant Homy Hsu ("Mr. Hsu"), by and through his counsel of record, hereby stipulate and request an order from the Court modifying the conditions of Mr. Hsu's pretrial release as follows:

1. Mr. Hsu was released on bond following a hearing before this Court on Thursday, August 18, 2011. One of the conditions of pretrial release imposed was that Mr. Hsu be placed on GPS monitoring at the direction of Pretrial Services. The Court indicated that it would like to obtain Pretrial Services' and the parties' positions regarding whether to continue GPS monitoring, after Mr. Hsu had completed at least one month of such monitoring.

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2. At this time, the parties, in consultation with Supervising Pretrial Services Officer Allen Lew, agree and request that Mr. Hsu remain on GPS monitoring and that he be free to leave his residence except during the Court-imposed curfew hours of 11:00 p.m. to 6:00 a.m. daily subject to such monitoring. Pretrial Services and the parties agree that Mr. Hsu has been complying with the conditions of his supervised release and that GPS monitoring has proven to be a workable method to allow Mr. Hsu freedom of movement while still allowing Pretrial Services to monitor his whereabouts.

3. The parties, also in consultation with Pretrial Services, further agree and request that the conditions of Mr. Hsu's pretrial release be modified to remove the restrictions on the permissible purposes for which Mr. Hsu may leave his residence. Currently, the conditions of release only allow Mr. Hsu to leave home for work, exercise, shopping, court appearances, and medical appointments. The parties agree and request that Mr. Hsu be permitted to leave his residence between the hours of 6:00 a.m. and 11:00 p.m. daily for any purpose.

4. The parties further agree and request that the condition of pretrial release restricting Mr. Hsu's travel to the Northern District of California be modified for the limited purpose of allowing Mr. Hsu to travel to Las Vegas, Nevada, between October 30, 2011 and November 5, 2011. The purpose of this travel is so that Mr. Hsu can attend the SEMA trade show, which is a very important trade show in the auto parts industry. It is stipulated and agreed that Mr. Hsu will travel to Las Vegas by car, not air, and will remain on GPS monitoring throughout his time traveling to and in Las Vegas. Supervising Pretrial Services


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Officer Allen Lew has agreed to the requested travel to Las Vegas, subject to the condition that Mr. Hsu travel by car and maintain contact by GPS monitoring.


IT IS SO STIPULATED.

Dated: October 18, 2011

  
JACKLIN CHOU LEM  
HOWARD J. PARKER  
Antitrust Division  
U.S. Department of Justice

Attorneys for Plaintiff United States

Dated: October 18, 2011

  
BECKY WALKER JAMES  
Law Offices of Becky Walker James

Attorney for Defendant Homy Hsu

GOOD CAUSE APPEARING, IT IS SO ORDERED.

Dated: Oct. 18, 2011

  
HON. NATHANAEL COUSINS  
United States Magistrate Judge