



USA v. Kalasho et al

2015 | Cited 0 times | E.D. California | January 23, 2015

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:08-cr-00577-KJM P l a i n t i f f ,) AMENDED
UNOPPOSED EX PARTE A P P L I C A T I O N T O M O D I F Y v.) CONDITIONS OF BOND TO
P E R M I T T R A V E L ; [P R O P O S E D] ANIL MALHI,) ORDER Defendant.)

_____) COMES NOW the defendant Anil Malhi, who hereby
moves the court for a modification of his conditions of bond as follows:

1. That the bond of the defendant Anil Malhi be amended and modified to permit the defendant to travel to China and India between February 6, 2015 and February 21, 2015. The travel is for purposes of traveling to China and India on a business trip to meet with his primary supplier.

2. That for the purposes of this travel, Pretrial Services shall release to the defendant his passport, which shall be returned to Pretrial Services by the defendant on or before February 24, 2015.

Assistant United States Attorney Michael Dwight Anderson has indicated that he has no 1 2 3 4 5 6 7
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2 objection to this modification of bond. Pretrial Services Officer Taifa Gaskins (916) 930-4350 has been informed of these requests and has stated the defendant is in compliance and Pretrial Services defers to the court. This Amended Ex Parte Application is based upon the records and files of this case, and the attached Declaration of Donald M. Ré. WHEREFORE, the defendant Anil Malhi respectfully requests that the conditions of his bond be modified as stated herein. Dated: January 21, 2015 DONALD M. RÉ A Professional Law Corporation

/s/ Donald M. Ré Donald M. Ré Attorney for Defendant Anil Malhi 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15
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DECLARATION OF DONALD M. RÉ Donald M. Ré deposes and says: 1. Declarant is an attorney at law licensed to practice before the courts of the State of California and before this court. Declarant is the attorney for the defendant Anil Malhi herein. 2. As a condition of his bond, Mr. Malhi has been restricted in his travel, and has surrendered his passport to Pretrial Services. 3. Mr. Malhi has indicated that he desires to travel to China and India between February 6, 2015 and February 21, 2015. The travel is for the purposes of traveling to China and India on a business trip to meet with his primary supplier. The previous application, which was granted, incorrectly stated defendant was only traveling to China. 4. Declarant contacted Pretrial Services Officer Taifa Gaskins on January 8, 2015. Ms Gaskins has indicated the defendant is in compliance and Pretrial Services defers to the court.

Declarant has contacted Assistant United States Attorney Michael Anderson, (916) 554- 2755 who has indicated that he has no objection to this modification of bond. I declare under penalty of perjury the foregoing is true and correct. Executed this 21 st

day of January, 2015. Donald M. Ré DONALD M. RÉ, Declarant

ORDER IT IS SO ORDERED. Dated: January 23, 2015.

