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 United States of America  
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10 **UNITED STATES DISTRICT COURT**  
 11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 UNITED STATES OF AMERICA,  
 13

14 Plaintiff,

15 v.

16 RONALD GRUSD (1),  
 GONZALO PAREDES (2),  
 CALIFORNIA IMAGING NETWORK  
 17 MEDICAL GROUP (5),  
 WILLOWS CONSULTING COMPANY(6),  
 18

19 Defendants.  
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Case No. 15CR2821-BAS

**RESPONSE IN OPPOSITION TO  
 DEFENDANT GRUSD’S MOTION  
 TO CONTINUE TRIAL UNTIL  
 NOVEMBER 2017**

21 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its  
 22 counsel, Alana W. Robinson, Acting United States Attorney, and Valerie H. Chu, Caroline  
 23 P. Han, and Fred Sheppard, Assistant United States Attorneys, to submit this Response in  
 24 Opposition to the Motion to Continue Trial in this matter.  
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26 On March 2, 2017, Defendant Grusd filed a motion to continue the trial date until  
 27 November 2017, two years after the Indictment was returned. Defendants Grusd,  
 28 California Imaging Network Medical Group, and Willows Consulting Company have been

1 represented by present counsel since October 2016. On March 31, 2017, Defendants  
2 Grusd, California Imaging Network Medical Group, and Willows Consulting Company  
3 rejected a plea offer in this matter.

4 As an initial matter, a two-terabyte hard drive was provided in order to receive  
5 discovery in this matter. However, that does not represent the amount of discovery actually  
6 tendered; instead, less than half a terabyte of discovery has been produced. Moreover, the  
7 decision to litigate the protective order before obtaining discovery versus obtaining  
8 discovery and reviewing it while simultaneously litigating the scope of the protective order  
9 was a litigation strategy chosen by counsel. Finally, discovery related to an advice of  
10 counsel defense was in the Defendants' possession, meaning that such has been available  
11 for review since counsel was retained in this matter -- nearly seven months ago.

12 The United States objects to any continuance of the trial beyond August 1, 2017.

13  
14 DATED: April 3, 2017

Respectfully submitted,

ALANA W. ROBINSON  
Acting United States Attorney

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17 /s/ Fred Sheppard  
FRED SHEPPARD  
Assistant U.S. Attorney  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

Criminal Case No. 15CR2821-BAS  
CERTIFICATE OF SERVICE

v.

RONALD GRUSD (1),  
GONZALO PAREDES (2),  
CALIFORNIA IMAGING NETWORK  
MEDICAL GROUP (5),  
WILLOWS CONSULTING  
COMPANY (6),  
Defendants.

I, FRED SHEPPARD, am a citizen of the United States and am at least 18 years of age. My business address is 880 Front Street, Room 6293, San Diego, California, 92101-8893. I am not a party to the above-entitled action. I have caused service of the **Response in Opposition to Defendant Grusd’s Motion to Continue Trial Until November 2017** on the parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them:

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 3, 2017.

s/ Fred Sheppard