

MAR 30 2016

Sherril R. Carter, Executive Officer/Clerk
By Teresa Alcantar, Deputy

1 Kia Feyzjou SBN 209816
2 KIA FEYZJOU LAW FIRM
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7 Attorney for Defendant.
8 ALBERTO

9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES – POMONA COURTHOUSE

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,
13 Plaintiff,
14 vs.
15 ALBERTO
16 Defendant.

CASE NO.: 5PM

**NOTICE OF MOTION TO DISMISS
FOR DENIAL OF SPEEDY TRIAL**
[Penal Code §686(1)]; DECLARATION
OF KIA FEYZJOU; DECLARATION
OF ALBERTO
DECLARATION OF JULIA
HURTADO-TORRES

Dept.: E
Date: 4/13/16
Time: 8:30

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19 TO THE DISTRICT ATTORNEY OF LOS ANGELES COUNTY AND/OR
20 HIS REPRESENTATIVE:

21 PLEASE TAKE NOTICE that on 4/13/16 at the hour of 8:30
22 a.m. or as soon thereafter as the matter may be heard in Department E of the above-
23 entitled court, the Defendant will move for an order dismissing the action.

24 The motion will be made on the ground that the prejudicial delay after the
25 initiation of formal charges against the defendant constituted a violation of the speedy trial
26 provisions of the Sixth and Fourteenth Amendments of the United States Constitution, and
27 Article I, §15 of the California Constitution.
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