

CHARLES R. GOODWIN, ESQ  
GOODWIN LAW GROUP, PLLC  
6671 Las Vegas Blvd S Suite 210  
Las Vegas, NV 89119  
Telephone: (702) 472-9594  
[charles@goodwinlawgroup.net](mailto:charles@goodwinlawgroup.net)  
*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ORI SALOMON,

Defendant.

CASE NO.: 2:26-mj-00081-EJY

STIPULATION BETWEEN THE  
GOVERNMENT AND DEFENDANT TO  
CONTINUE PRELIMINARY HEARING

The parties herein, the United States and Defendant Ori Salomon, stipulate and agree that the preliminary hearing set in this case for February 17, 2026, be continued to a time convenient for the Court but not before 90 days. The reasons for this stipulation are as follows:

1. On February 6<sup>th</sup>, 2026, Mr. Salomon was released on a personal bond and is currently out on minimal pretrial release conditions. Both the Defense and the Government agree that it is in the best interests of justice to continue the preliminary hearing to see if a negotiation can be found.

1 2. Counsel was only retained last week and has not yet received discovery. Any  
2 preliminary hearing would be impossible to do because there is no evidence for  
3 defense counsel to review yet.

4 3. Counsel will be unable to be ready on February 17<sup>th</sup> date. Even if all discovery was  
5 given to defense counsel right now, counsel would not be prepared to move  
6 forward on the February 17<sup>th</sup> date.

7  
8 The parties stipulate that the preliminary hearing date in this matter should be  
9 continued to a time convenient for the Court but not before 90 days.

10 Respectfully submitted this 9<sup>th</sup> day of February, 2026.

11  
12 TODD BLANCHE  
13 Deputy Attorney General of the United  
States

GOODWIN LAW GROUP

14 */s/ Clay Plummer*

*/s/ Charles R. Goodwin*

15 \_\_\_\_\_  
16 CLAY A. PLUMMER  
Assistant United States Attorney

\_\_\_\_\_  
CHARLES R. GOODWIN, ESQ.  
Attorney for Defendant

**ORDER**

Based on the parties' stipulation, and good cause appearing, the Preliminary Hearing date that is set for February 17, 2026, at 4:00 PM, is vacated and continued to

\_\_\_\_\_, 2026, at the time of \_\_\_\_\_.

DATED: \_\_\_\_\_.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing Stipulation and Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: 2/2/2026

Respectfully submitted,

/s/ Charles R Goodwin  
CHARLES R. GOODWIN, ESQ  
Nevada Bar No. 14879  
Attorney for Defendant