

1 BENJAMIN B. WAGNER
 United States Attorney
 2 BENJAMIN E. HALL (SBN 219924)
 Assistant United States Attorney
 3 United States Courthouse
 2500 Tulare Street, Suite 4401
 4 Fresno, California 93721
 Telephone: (559) 497-4000
 5 Facsimile: (559) 497-4099
 6 Attorneys for Defendant
 United States of America
 7

8
 9 **UNITED STATES DISTRICT COURT**
 10 **EASTERN DISTRICT OF CALIFORNIA**

11	VERONICA NEGRETE,)	1:06-cv-01688-LJO-SMS
12)	
13	Plaintiff,)	STIPULATION AND
14)	ORDER FOR EXTENSION OF TIME
15	v.)	TO FILE CLOSING DOCUMENTS
16	UNITED STATES OF AMERICA,)	
17)	
18	Defendant.)	

17 Plaintiff, Veronica Negrete, and Defendant, United States of
 18 America, respectfully request an extension of time to August 20,
 19 2010, to file appropriate papers to dismiss this action in its
 20 entirety. The parties have signed an agreement to fully and
 21 finally settle all claims in this action, and counsel have
 22 submitted to the appropriate federal agency the documents
 23 necessary to effectuate the settlement. As of this date,
 24 however, the agency has not yet completed its processing and
 25 payment of the settlement amount. The parties therefore request
 26 that the Court grant the requested extension of time to fully
 27 conclude this matter.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 15, 2010.

RESPECTFULLY SUBMITTED,

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Benjamin E. Hall
BENJAMIN E. HALL
Assistant U.S. Attorney
Attorneys for Defendant

Dated: July 15, 2010.

QUINLAN, KERSHAW & FANUCCHI

[As authorized 7/15/10]

By: /s/ David M. Moeck
DAVID M. MOECK
Attorneys for Plaintiff

ORDER

FOR GOOD CAUSE STATED, THE EXTENSION IS GRANTED.

IT IS SO ORDERED.

Dated: July 15, 2010

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE