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6 Attorneys for United States of America  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 APPROXIMATELY \$70,563.22 IN U.S.  
CURRENCY SEIZED FROM MISSION  
15 BANK ACCOUNT NUMBER 3000288,  
16 Defendant.

Case No. 1:13-CV-00602-JLT

JOINT STIPULATION TO CONTINUE  
SCHEDULING CONFERENCE ORDER  
DATES; ORDER

(Doc. 23)

17 The United States, Claimant James Park and Potential Claimant Helen Park, by  
18 and through their attorney of record, hereby move for a continuance of the discovery and  
19 disclosure dates currently set forth in the Court's Scheduling Order (ECF No. 22).  
20

21 The parties jointly agree that to facilitate and complete full discovery and disclosure  
22 of said discovery, the discovery and disclosure dates currently set forth in the Joint  
23 Scheduling Report should be extended approximately 90 days and that the remaining  
24 dates in the Court's Scheduling Order issued pursuant thereto should be extended  
25 approximately 90 days;  
26

27 Since the time of the initial scheduling conference, Ellis Park, counsel for Claimant  
28

1 James Park and Potential Claimant Helen Park has undergone invasive surgery to  
2 remove part of his lower right lung. Additionally, Counsel has had complications arise  
3 from the surgery, has been hospitalized, and is currently under doctors care and unable to  
4 meet with his clients in order to prepare discovery responses and clear dates for  
5 depositions.

6 Due to Attorney Park's recent serious health issues, the parties now jointly  
7 agree the discovery and disclosure dates currently set forth in the Joint Scheduling Report  
8 and the Court's Scheduling Order issued pursuant thereto should be extended  
9 approximately sixty (90) days, and the remaining scheduling dates should be extended  
10 ninety (90) days;

11 The parties hereby stipulate and propose that the dates set forth in the Court's  
12 Scheduling Order (ECF No. 22) should be changed to the following dates:

<b>Scheduling Order Date</b>	<b>Current Date/Deadline</b>	<b>Proposed New Date</b>
Non-Expert Discovery Cutoff	September 30, 2014	December 30, 2014
Expert Disclosure	September 2, 2014	December 2 , 2014
Supplemental Expert Disclosure	No Dates Given	N.A.
Expert Discovery Cutoff	October 30, 2014	January 30, 2015
Non-Dispositive Motion Filing	November 26, 2014	February 26, 2015
Dispositive Motion Filing	January 26, 2015	April 26, 2015
Pre-Trial Conference Date	March 17, 2015	June 17, 2015
Court Trial Date	May 26, 2015	August 26, 2015

23 Dated: July 22, 2014

23 Respectfully submitted,  
24 BENJAMIN B. WAGNER  
25 United States Attorney

26 /s/ Heather Mardel Jones  
27 HEATHER MARDEL JONES  
28 Assistant United States Attorney

1 Dated: July 22, 2014

/s/ Ellis Park  
ELLIS PARK  
Attorney for Claimant James Park  
and Potential Claimant Helen Park

5 **ORDER**

6 All dates currently set forth in the Court's Scheduling Order (ECF No. 22) shall be  
7 rescheduled to those dates stipulated to by the parties, as set forth hereinabove **except**  
8 **that** the bench trial is set on **September 14, 2015.**

9  
10 IT IS SO ORDERED.

11 Dated: **July 23, 2014**

**/s/ Jennifer L. Thurston**  
UNITED STATES MAGISTRATE JUDGE