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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 \$28,120.00 IN U.S.
CURRENCY,
15 Defendant.

1:13-CV-00640-AWI-BAM

STIPULATION TO CONTINUE
SCHEDULING CONFERENCE ORDER
DATES; ORDER

16
17 The United States of America and claimant Jean Labanda (“Claimant”), by and
18 through their attorneys of record, hereby stipulate as follows:

19 On April 15, 2014, Claimant filed a motion to dismiss the complaint. (ECF No. 29).
20 On May 2, 2014, the parties stipulated to stay discovery for 120 days (beginning on May
21 14, 2014), pending a ruling on the motion to dismiss. (ECF No. 31, 34). That stay ended
22 on September 13, 2014. The United States seeks to begin discovery. Claimant desires to
23 continue to stay discovery pending a ruling on Claimant’s dispositive motion. The current
24 deadline to conclude non-expert discovery is January 10, 2015 (roughly 100 days away).

25 To avoid an unnecessary discovery dispute, the parties hereby stipulate and request
26 that the Court continue the Non-Expert and Expert Discovery Cutoff dates set forth in the
27 Court’s Scheduling Order (ECF No. 26) as follows:

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Scheduling Order Date	Current Date/Deadline	Proposed New Date
Non-Expert Discovery Cutoff	January 10, 2015	April 10, 2015
Expert Disclosure	January 10, 2015	No change
Supplemental Expert Disclosure	February 5, 2015	No change
Expert Discovery Cutoff	March 11, 2015	April 10, 2015
Non-Dispositive Motion Filing	May 8, 2015	No change
Dispositive Motion Filing	June 10, 2015	No change
Pre-Trial Conference Date	September 16, 2015	No change
Jury Trial Date	November 17, 2015	No change

Respectfully submitted,

DATED: September 26, 2014

BENJAMIN B. WAGNER
United States Attorney

/s/ Jeffrey A. Spivak
JEFFREY A. SPIVAK
Assistant United States Attorney

DATED: September 26, 2014

/s/ Jacek W. Lentz
JACEK W. LENTZ, ESQ.
Attorney for Claimant Jean Labanda

(As authorized by email on September 26, 2014)

ORDER

IT IS SO ORDERED.

All dates currently set forth in the Court's Amended Scheduling Order and May 14, 2014 Order (ECF No. 26, 34) shall be rescheduled to those dates stipulated to by the parties as set forth hereinabove.

IT IS SO ORDERED.

Dated: October 2, 2014

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

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