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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	1:13-CV-01074-GSA
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	NON-EXPERT DISCOVERY
v.)	DEADLINE; ORDER
)	
APPROXIMATELY \$17,285.00 IN U.S.)	(Doc. No. 43)
CURRENCY,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED by and between the United States of America,
claimant Debra A. Pereira, and her counsel of record, as follows:

On January 22, 2014, the parties to this matter submitted their Joint Scheduling
Report setting forth the various discovery, disclosure, and dispositive motion dates, as
required pursuant to FRCP Rule 16(b) (ECF 17); On July 31, 2014 and again on September
23, 2014, the Court granted the parties' stipulated request to extend discovery and
non-dispositive motion dates (ECF 33, 36);

Due to ongoing settlement negotiations, the parties request that the non-expert
discovery deadline be extended approximately 45 days;

Such extension would not affect the trial date or the dispositive motion deadline.

The parties hereby stipulate to the following dates:

Discovery Event	Current Date/Deadline	Proposed New Date
Expert Disclosure	December 5, 2014	UNCHANGED
Supplemental Expert	December 6, 2014	UNCHANGED
Non-Expert Discovery	February 4, 2015	March 13, 2015
Expert Discovery	March 13, 2015	UNCHANGED
Nondispositive Motion Filing Deadline	April 10, 2015	UNCHANGED
Dispositive Motion Filing Deadline	May 4, 2015	UNCHANGED
Settlement Conference	Not Set	Not Set
Pretrial Conference	August 5, 2015	UNCHANGED
Court Trial (3 day estimate)	September 29, 2015	UNCHANGED

Respectfully submitted,

DATED: December 23, 2014

BENJAMIN B. WAGNER
United States Attorney

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

DATED: December 26, 2014

/s/ Raymond N. Baker
RAYMOND N. BAKER
Attorney for Claimant Debra A. Pereira
(Signature authorized by email)

ORDER

The Court adopts the parties' stipulation as set forth above. Accordingly, the non-expert discovery deadline shall be continued from February 4, 2015 to March 13, 2015. All other discovery dates/deadlines currently set forth in the Court's January 29, 2014 Scheduling Order (ECF 22), as modified by the Orders to Continue FRCP Rule 16(b) Scheduling Order Discovery Dates (ECF 33, 36), shall remain unchanged.

IT IS SO ORDERED.

Dated: January 7, 2015

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE