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

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

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

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

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

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

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1                   The parties hereby stipulate to the following dates:

2 <b>Discovery Event</b>	3 <b>Current Date/Deadline</b>	4 <b>Proposed New Date</b>
5                   Expert Disclosure	6                   December 5, 2014	7                   UNCHANGED
8                   Supplemental Expert	9                   December 6, 2014	10                  UNCHANGED
11 <b>Non-Expert Discovery</b>	12 <b>February 4, 2015</b>	13 <b>March 13, 2015</b>
14                  Expert Discovery	15                  March 13, 2015	16                  UNCHANGED
17                  Nondispositive Motion 18                  Filing Deadline	19                  April 10, 2015	20                  UNCHANGED
21                  Dispositive Motion Filing 22                  Deadline	23                  May 4, 2015	24                  UNCHANGED
25                  Settlement Conference	26                  Not Set	27                  Not Set
28                  Pretrial Conference	29                  August 5, 2015	30                  UNCHANGED
31                  Court Trial (3 day estimate)	32                  September 29, 2015	33                  UNCHANGED

12                   Respectfully submitted,

13                  DATED: December 23, 2014

14                  BENJAMIN B. WAGNER  
United States Attorney

15                  \_\_\_\_\_  
16                  /s/ Jeffrey A. Spivak  
17                  JEFFREY A. SPIVAK  
18                  Assistant United States Attorney

19                  DATED: December 26, 2014

20                  \_\_\_\_\_  
21                  /s/ Raymond N. Baker  
22                  RAYMOND N. BAKER  
23                  Attorney for Claimant Debra A. Pereira  
24                  (Signature authorized by email)

## 25                  ORDER

26                  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.

27                  IT IS SO ORDERED.

28                  Dated: January 7, 2015

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/s/ **Gary S. Austin**  
UNITED STATES MAGISTRATE JUDGE