1 2 3 4	BENJAMIN B. WAGNER United States Attorney JEFFREY A. SPIVAK Assistant United States Attorney United States Courthouse 2500 Tulare Street, Suite 4401 Fresno, California 93721		
5	Telephone: (559) 497-4000 Facsimile: (559) 497-4099		
6	Attorneys for United States of America		
7	IN THE UNITED STATES DISTRICT COURT		
8	FOR THE EASTERN DISTRICT OF CALIFORNIA		
9			
10	UNITED STATES OF AMERICA,	Case No. 1:13-CV-01542 GSA	
11	Plaintiff,	STIPULATION TO CONTINUE DISCOVERY	
12 13	V.	AND DISCLOSURE DATES; ORDER	
14	APPROXIMATELY \$30,000.00 IN U.S. CURRENCY,	THEREON	
15	Defendant.	DOC. 17	
16	The United States and Claimant Al	fonce Rames ("Rames"), by and through their	
17	The United States and Claimant Alfonso Ramos ("Ramos"), by and through their attorneys of record, hereby move for a continuance of certain discovery and disclosure		
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	the discovery and disclosure dates currently set forth in the Joint Scheduling Report and		
21	the Court's Scheduling Order issued pursuant thereto should be extended. Such extension		
22	will have no effect on the trial date in this case.		
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The parties hereby stipulate and propose that the dates set forth in the Court's Scheduling Order (ECF No. 16) should be changed to the following dates:

Scheduling Order Date	Current Date/Deadline	Proposed New Date
Non-Expert Discovery Cutoff	July 11, 2014	December 5, 2014
Expert Disclosure	August 8, 2014	December 5, 2014
Supplemental Expert Disclosure	September 8, 2014	January 2, 2015
Expert Discovery Cutoff	November 7, 2014	February 3, 2015
Non-Dispositive Motion Filing	December 12, 2014	March 3, 2015
Dispositive Motion Filing	April 3, 2015	No change
Pre-Trial Conference Date	July 10, 2015	No change
Jury Trial Date	September 9, 2015	No change

Respectfully submitted, 13 DATED: June 10, 2014 BENJAMIN B. WAGNER United States Attorney 14 15 /s/ Jeffrey A. Spivak JEFFREY A. SPIVAK 16 Assistant United States Attorney 17 DATED: June 10, 2014 /s/ Charles A. Pacheco CHARLES A. PACHECO 18 Attorney for Claimant Alfonso Ramos 19 (Original signature retained by attorney) 20 **ORDER** 21

The Court adopts the parties' stipulation set forth above, with the exception that the non-dispositive motion filing date is extended from December 12, 2014 to February 17, 2015.

IT IS SO ORDERED.

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Dated: June 12, 2014 /s/ Gary S. Austin

## UNITED STATES MAGISTRATE JUDGE

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