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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,

13 v.

14 APPROXIMATELY \$30,000.00 IN U.S.
CURRENCY,
15 Defendant.

Case No. 1:13-CV-01542-LJO-GSA

STIPULATION TO CONTINUE NON-
EXPERT DISCOVERY CUT-OFF; ORDER

16 The United States and Claimant Alfonso Ramos (“Ramos”), by and through their
17 attorneys of record, hereby move for a continuance of certain discovery and disclosure
18 dates currently set forth in the Court’s Scheduling Order (ECF No. 16) as modified by the
19 Order Continuing Scheduling Order Dates (ECF No. 18).

20 The parties jointly agree that to facilitate and complete full discovery in this case,
21 the discovery and disclosure dates currently set forth in the Joint Scheduling Report and
22 the Court’s Scheduling Order issued pursuant thereto should be extended. Such extension
23 will have no effect on the trial date in this case.

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1 The parties hereby stipulate and propose that the dates set forth in the Court's
 2 Scheduling Order (ECF No. 16) as modified by the Court's subsequent Order (ECF No. 18)
 3 should be changed to the following dates:

Scheduling Order Date	Current Date/Deadline	Proposed New Date
Non-Expert Discovery Cutoff	December 5, 2014	February 3, 2015
Expert Disclosure	December 5, 2014	No change
Supplemental Expert Disclosure	January 2, 2015	No change
Expert Discovery Cutoff	February 3, 2015	No change
Non-Dispositive Motion Filing	March 3, 2015	No change
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

14 DATED: December 5, 2014

14 Respectfully submitted,
 15 BENJAMIN B. WAGNER
 16 United States Attorney

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

20 DATED: December 5, 2014

20 /s/ Charles A. Pacheco
 21 CHARLES A. PACHECO
 22 Attorney for Claimant
 23 Alfonso Ramos

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ORDER

Based on the foregoing stipulation, the non-expert discovery cut-off set forth in the Court's Scheduling Orders (ECF No. 16 and 18) shall be extended to February 3, 2015.

IT IS SO ORDERED.

Dated: **December 5, 2014**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE