| 1        | BENJAMIN B. WAGNER<br>United States Attorney<br>KEVIN C. KHASIGIAN<br>Assistant U.S. Attorney<br>501 I Street, Suite 10-100<br>Sacramento, CA 95814<br>Telephone: (916) 554-2700 |  |
|----------|--|--|
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| 3        |  |  |
| 4        |  |  |
| 5        | Attorneys for the United States  |  |
| 6        |  |  |
| 7        |  |  |
| 8        | IN THE UNITED STATES DISTRICT COURT  |  |
| 9        | EASTERN DISTRICT OF CALIFORNIA   |  |
| 10       |  |  |
| 11       | UNITED STATES OF AMERICA,  | 2:07-CV-01290-WBS-DAD  |
| 12       | Plaintiff,   | STIPULATION AND [ <del>PROPOSED</del> ]<br>ORDER TO EXTEND DEADLINE TO<br>FILE JOINT STATUS REPORT |
| 13       | v.   |  |
| 14       | APPROXIMATELY \$9,000.00 IN U.S.<br>CURRENCY, and  |  |
| 15<br>16 | APPROXIMATELY \$4,580.00 IN U.S.<br>CURRENCY,  |  |
| 17       | Defendants.  |  |
| 18       |  |  |
| 19       | The United States and claimants Wei Jei Ma ("Ma") and Cindy Woo ("Woo"),   |  |
| 20       | through undersigned counsel, stipulate and request the Court continue the deadline to  |  |
| 21       | file a Joint Status Report from September 1, 2014 to November 28, 2014.  |  |
| 22       | On June 29, 2007, the United States filed a civil forfeiture complaint against the   |  |
| 23       | above-captioned currency ("defendant currency") based on its alleged involvement in  |  |
| 24       | federal drug law violations. All known potential claimants to the defendant properties   |  |
| 25       | were served in a manner consistent with <i>Dusenbery v. United States</i> , 534 U.S. 161, 168  |  |
| 26       | (2002) and the applicable statutory authority. Additionally, on July 18, 2007, the United  |  |
| 27       | States published notice of this action in The Recorder (San Francisco and San Mateo  |  |
| 28       | Counties) and the Inter-City Express (Alameda County), as required by Rule   |  |

G(4)(a)(iv)(A) of Supplemental Rules for Admiralty or Maritime Claims and Asset 1 Forfeiture Actions. 2

On August 1, 2007, Wei Jei Ma and Cindy Woo filed claims alleging an interest in 3 the defendant currency, followed by their answers on August 20, 2007. No other party 4 has entered this case and the United States has provided notice to all potential claimants 5 pursuant to law. 6

Ma was criminally indicted in a parallel criminal case, United States v. Wei Jei Ma, 7 2:07-CR-00025-EJG, and is awaiting sentencing. 8

In light of Ma's pending sentencing, the parties request a continuance of the 9 deadline to file a Joint Status Report from September 1, 2014 to November 28, 2014, or to 10 another date the Court deems appropriate. 11

| 12       | Dated: <u>8/28/14</u><br>United States Attorney                                    |  |  |
|----------|--|--|--|
| 13<br>14 | By: <u>/s/ Kevin C. Khasigian</u><br>KEVIN C. KHASIGIAN<br>Assistant U.S. Attorney |  |  |
| 15       | Dated: <u>8/27/14</u><br>/s/ Stuart Hanlon   |  |  |
| 16       | STUART HANLON<br>Attorney for Claimants  |  |  |
| 17       | (Authorized via email)   |  |  |
| 18       | ORDER  |  |  |
| 19       | Pursuant to the parties' stipulation, the Court makes the following order:         |  |  |
| 20       | The deadline to file a Joint Status Report currently due on September 1, 2014 IS   |  |  |
| 21       | CONTINUED to November 28, 2014. <u>The Scheduling Conference is continued to</u>   |  |  |
| 22       | December 8, 2014 at 2:00 p.m.  |  |  |
| 23       | IT IS SO ORDERED.  |  |  |
| 24       | Dated: August 29, 2014   |  |  |
| 25       | Million to Shabe   |  |  |
| 26       | WILLIAM B. SHUBB   |  |  |
| 27       | UNITED STATES DISTRICT JUDGE   |  |  |
| 28       |  |  |  |
|          | 2  |  |  |

Stipulation and [Proposed] Order to Extend the Deadline to File a Joint Status Report