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

11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$180,534.29 IN U.S.
 CURRENCY SEIZED FROM SAFE CREDIT
 15 UNION ACCOUNT NUMBER 342139-00,
 AND,
 16 APPROXIMATELY \$10,000.00 IN U.S.
 CURRENCY SEIZED FROM SAFE
 17 CREDIT UNION ACCOUNT NUMBER
 18 342139-20,
 19 Defendants.

Case No.: 2:08-cv-02148-LKK-DAD

**STIPULATION TO CONTINUE
 DISCOVERY DEADLINE AND EXPERT
 DISCLOSURE DATE; ORDER THEREON**
(First Request)

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 21 Plaintiff UNITED STATES OF AMERICA (“Plaintiff”) and Claimants FRANK W.
 22 BLUE, JR. and MARGARET CHAVEZ-BLUE (hereafter “Claimants”), by and through their
 23 undersigned attorneys, hereby stipulate:

- 24 1. This stipulation is executed by all Parties who have appeared in and are affected by
- 25 this action.
- 26 2. The parties are requesting a twelve day extension to the discovery deadline to schedule
- 27 expert disclosures and depositions after a full review of written discovery and non-
- 28 expert deposition testimony. This brief change to the Court’s Scheduling Conference

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Order is needed due to the recent substitution of Claimants' counsel, the large amount of financial and real estate transaction records in the case, Plaintiff's counsel's trial schedule for the month of May 2012, and the coordination of federal agents and defendants involved in the related criminal case, *United States v. Miguel Vasquez, Jr., et al.*, Case No. 2:08-CR-00212-LKK.

3. Since the time of the initial scheduling conference, the primary federal agent involved in the criminal investigation was promoted to another post in the Internal Revenue Service. That agent and others involved in the criminal case required a brief extension to organize and compile the large number of financial documents requested in civil discovery.
4. Additionally, Claimants' original counsel was removed from the case approximately two months ago hindering previous efforts to coordinate discovery and retain testifying experts.
5. Plaintiff's counsel has trial scheduled on May 22, 2012 in *United States v. Jamerson*, Case No. 11-CR-00261-GEB and is unavailable to take/defend depositions until the conclusion of trial.
6. The Parties request that the Court permit their experts to produce their written reports on July 6, 2012 and, if needed, be available for deposition until July 13, 2012. This extension will allow the Parties' experts to review written discovery and multiple deposition transcripts, as well as draft their expert reports in accordance with the Federal Rules of Civil Procedure.
7. This is the Parties' first request for an extension.
8. The Parties agree upon the following proposed modifications to the Court's Scheduling Conference Order:

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Event	Existing Date	Proposed New Date
United States Expert Disclosure Deadline	May 2, 2012	June 15, 2012
Claimants' Expert Disclosure Deadline	May 2, 2012	June 15, 2012
Disclosure of Expert Reports	May 2, 2012	July 6, 2012
Deposition(s) of United States Designated Expert(s)	N/A	To be completed by July 13, 2012
Deposition(s) of Claimants' Designated Expert(s)	N/A	To be completed by July 13, 2012
Discovery Deadline	July 1, 2012	July 13, 2012

BENJAMIN B. WAGNER
United States Attorney

Dated: 4/25/12

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


Dated: April 25, 2012

By: /s/ Sara J. Dresser for
JOHN R. HALUCK
Attorney for Claimants
FRANK W. BLUE, JR. and MARGARET
CHAVEZ-BLUE
(Signature retained by attorney)

ORDER

IT IS SO ORDERED.

Dated: May 1, 2012.


LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT