| 1  | BENJAMIN B. WAGNER<br>United States Attorney                    |   |
|----|---|---|
| 2  | SARALYN M. ANG-OLSON, SBN 197404                                |   |
| 3  | Special Assistant United States A<br>501 I Street, Suite 10-100 | Attorney  |
| 4  | Sacramento, CA 95814<br>Telephone: (916) 554-2700               |   |
| 5  | Attorneys for Plaintiff<br>United States of America             |   |
| 6  | United States of America  |   |
| 7  |   |   |
| 8  | IN THE UNITED STAT  | TES DISTRICT COURT  |
| 9  | FOR THE EASTERN DIS   | STRICT OF CALIFORNIA                                      |
| 10 |   |   |
| 11 | UNITED STATES OF AMERICA, )                                     | 2:09-cv-03565-JAM-KJM                                     |
| 12 | Plaintiff,  | STIPULATION FOR EXTENSION<br>OF TIME TO FILE JOINT STATUS |
| 13 | V. )  | REPORT AND ORDER  |
| 14 | APPROXIMATELY \$19,160.00 IN )<br>U.S. CURRENCY, )              |   |
| 15 | Defendant.  | DATE: N/A<br>TIME: N/A                                    |
| 16 |   | COURTROOM: N/A  |
| 17 | ·································                               |   |

Pursuant to Local Rule 144(a) of the Local Rules for the United States District Court, Eastern District of California, plaintiff United States of America ("Plaintiff") and claimant Eric Ledezma ("Claimant"), by and through their respective counsel, hereby request that the joint status report currently due on February 24, 2010, be continued for approximately 35 days, or effectively be due on March 31, 2009.

Plaintiff and Claimant make this request for the following reasons: Plaintiff and Claimant are in the process of determining a resolution to this dispute. Under the circumstances, counsel for both Plaintiff and Claimant agree that

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Stipulation for EOT to File Joint Status Report; Proposed Order

| 1  | they are not in a position to co                                  | ontribute meaningfully either to                                     |  |
|----|---|--|--|
| 2  | the process of conferring on the matter as required by Fed. R.    |  |  |
| 3  | Civ. P. 26(f) or to the preparation of a resulting joint status   |  |  |
| 4  | report as required by the Court's Order on December 24, 2009.     |  |  |
| 5  | As soon as the need has become apparent, Plaintiff and            |  |  |
| 6  | Claimants without delay, hereby make their request pursuant to    |  |  |
| 7  | Local Rule 144(d). <u>See</u> L. R. 144(d).                       |  |  |
| 8  | As further required pursuant to Local Rule 144(b), the            |  |  |
| 9  | Plaintiff and Claimants hereby represent that no prior extension  |  |  |
| 10 | of time has previously been sought in regard to the filing of the |  |  |
| 11 | joint status report. <u>See</u> L. R. 144(b).                     |  |  |
| 12 | 1 1   | ENJAMIN B. WAGNER<br>nited States Attorney                           |  |
| 13 |   | nicea beaceb necorney  |  |
| 14 |   | s/ Saralyn M. Ang-Olson  |  |
| 15 | Sa  | aralyn M. Ang-Olson<br>Decial Assistant U.S. Attorney                |  |
| 16 |   |  |  |
| 17 | Dated: February 23, 2009 Mi                                       | ACKENZIE LAND LAW  |  |
| 18 |   |  |  |
| 19 |   | s/ Robert W. MacKenzie<br>DBERT W. MACKENZIE                         |  |
| 20 | A   | ttorney for Eric Ledezma   |  |
| 21 |   | Attorney sig. retained on file)                                      |  |
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| 28 |   | 2 Stipulation for EOT to File Joint<br>Status Report; Proposed Order |  |
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| 1  | ORDER  |
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| 2  | For the reasons set forth above, the parties shall submit a          |
| 3  | joint status report on or before March 31, 2010.                     |
| 4  |  |
| 5  | IT IS SO ORDERED.  |
| 6  |  |
| 7  | Dated: February 23, 2010 <u>/s/ John A. Mendez</u><br>JOHN A. MENDEZ |
| 8  | United States District Judge   |
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| 28 | 3 Stipulation for EOT to File Joint<br>Status Report; Proposed Order |