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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) 2:11-CV-00099-GEB-KJN
)
Plaintiff,) STIPULATION TO CONTINUE
) SCHEDULING DATES AND ORDER
v.) THEREON
)
REAL PROPERTY LOCATED AT 15438) (First Request)
OLD TOLL ROAD, CAMPTONVILLE,)
CALIFORNIA, YUBA COUNTY,)
APN: 064-210-041, INCLUDING)
ALL APPURTENANCES AND)
IMPROVEMENTS THERETO,)
)
Defendant.)
)

Claimant Gregory S. McClellan and plaintiff United States of America, by and through their undersigned attorneys, hereby stipulate as follows:

1. This stipulation is executed by all parties who have appeared in and are affected by this action.

2. The parties are requesting a brief extension of the discovery dates set out in the Scheduling Conference Order due to unavailability of counsel on said dates, to synchronize discovery efforts in this case and the related case, *United States v. Real Property Located at 15340 Old Toll Road, Camtonville, California*,

Case No: 2:11-CV-00091-GEB-KJN.¹ Since the time of the initial scheduling conference, counsel has been unavailable for depositions and requires additional time to respond to discovery due to pressing business on other cases. In addition, coordinating the discovery schedules in the two related cases reduces litigation expense and streamlines the discovery process. This is the Parties' first request for an extension.

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¹ Each civil forfeiture action originates from the same law enforcement investigation and action, a federal search warrant executed on September 16, 2010. See Doc. 1, 2:11-CV-00091-GEB-KJN; Doc. 1, 2:11-CV-00099-GEB-KJN. The related cases proceed on dissimilar discovery tracks given the litigation on an unrelated issue. Gregory S. McClellan filed his claim in Case No. 2:11-CV-00099-GEB-KJN on September 1, 2011.

3. The following dates are agreed on by the parties:

Event	Existing Date	Proposed Date
Non-Expert Discovery Deadline	November 1, 2011	December 9, 2011
Designation of Expert Witnesses	November 22, 2011	December 23, 2011

Dated: 10/28/11

BENJAMIN B. WAGNER
United States Attorney

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

Dated: 10/28/11

By: /s/ Stephen A. Munkelt
STEPHEN A. MUNKELT
Attorney for Claimant
Gregory S. McClellan

(Original signatures
retained by attorney)

ORDER

IT IS SO ORDERED.

Dated: November 22, 2011


GARLAND E. BURRELL, JR.
United States District Judge