1 BENJAMIN B. WAGNER
United States Attorney
KEVIN C. KHASIGIAN
Assistant U.S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff.

v.

APPROXIMATELY \$30,640.00 IN U.S. CURRENCY,

Defendant.

2:14-CV-00712-MCE-CKD

UNITED STATES' REQUEST TO EXTEND THE DEADLINE TO SUBMIT A JOINT STATUS REPORT FROM MAY 27, 2014 TO JULY 28, 2014; PROPOSED ORDER

The United States submits the following Request to Extend the Deadline to file a Joint Status Report from May 27, 2014 to July 28, 2014.

Introduction

On March 18, 2014, the United States filed a civil forfeiture complaint against the above-captioned currency ("defendant currency"), based on its involvement in federal drug law violations. All known potential claimants to the defendant currency were served in a manner consistent with *Dusenbery v. United States*, 534 U.S. 161, 168 (2002) and the applicable statutory authority. Additionally, public notice on the official internet government forfeiture site, www.forfeiture.gov, began on March 21, 2014, and ran for thirty consecutive days, as required by Rule G(4)(a)(iv)(C) of Supplemental Rules for

Admiralty or Maritime Claims and Asset Forfeiture Actions. A Declaration of Publication was filed on April 21, 2014. 2 **Good Cause** 3 The United States has diligently pursued its forfeiture case against the defendant 4 currency and noticed all known potential claimants as required by the Supplemental 5 Rules governing forfeiture cases. To date, no party has filed a claim or answer in this 6 case. On May 22, 2014, the United States filed a Request for Clerk's Default against 7 potential claimant Neal Alan Beauregard and intends to draft a motion for default 8 judgment and final judgment of forfeiture. Thus, there is good cause to extend the deadline to file a joint status report in this 10 case from May 27, 2014 to July 28, 2014, or to a date the Court deems appropriate. 11 12 Dated: 5/22/14 BENJAMIN B. WAGNER United States Attorney 13 14 /s/ Kevin C. Khasigian KEVIN C. KHASIĞIAN 15 Assistant U.S. Attorney 16 17 **ORDER** 18 The Court finds that there is good cause to extend the deadline to file a joint status 19 20 report in this case from May 27, 2014 to July 28, 2014. IT IS SO ORDERED. 21 Dated: June 24, 2014 22 23 24 MORRISON C. ENGLAND, JR. UNITED STATES DISTRICT COURT 25 26 27 28