

1 BENJAMIN B. WAGNER
 United States Attorney
 2 JEFFREY A. SPIVAK
 Assistant U.S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700
 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,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$18,928.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:14-CV-02765-MCE-KJN

STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE
 JOINT STATUS REPORT

17
 18 The United States and claimant Kurt Przygoda (“Przygoda”), through undersigned
 19 counsel, stipulate and request the Court continue the deadline to file a Joint Status
 20 Report from April 7, 2015 to June 8, 2015.

21 On November 25, 2014, the United States filed a civil forfeiture complaint against
 22 the above-captioned currency (“Defendant Currency”) based on its alleged involvement in
 23 federal drug law violations. All known potential claimants to the defendant properties
 24 were served in a manner consistent with Dusenbery v. United States, 534 U.S. 161, 168
 25 (2002) and the applicable statutory authority. Additionally, public notice on the official
 26 internet government forfeiture site, www.forfeiture.gov, began on December 4, 2014, and
 27 ran for thirty consecutive days, as required by Rule G(4)(a)(iv)(C) of Supplemental Rules
 28 for Admiralty or Maritime Claims and Asset Forfeiture Actions. A Declaration of

1 Publication was filed on January 9, 2015 (Doc. 7). Potential claimant Przygoda was
2 served on February 17, 2015 (ECF No. 10).

3 On January 5, 2015, Przygoda filed a claim alleging an interest in the defendant
4 currency (ECF No. 6). No other party has entered this case and the United States has
5 provided notice to all potential claimants pursuant to law.

6 The United States is in settlement negotiations with Przygoda and expects to file
7 settlement documents within the extension period. Otherwise, the parties will meet and
8 confer, and jointly prepare a joint status report.

9 There is good cause to continue the initial scheduling conference and deadline to
10 file a joint status report.

11 Dated: 4/3/15

BENJAMIN B. WAGNER
United States Attorney

12
13 By: /s/ Jeffrey A. Spivak
JEFFREY A. SPIVAK
Assistant U.S. Attorney

14 Dated: 4/3/15


15 /s/ Lisa B. Meier
LISA B. MEIER
Attorney for Claimant Kurt Przygoda
16
17 (Authorized via email)

18 **ORDER**

19 Pursuant to the parties' stipulation, the deadline to file a Joint Status Report
20 currently due on April 7, 2015 IS CONTINUED to June 8, 2015.

21 **IT IS SO ORDERED.**

22
23 Dated: April 7, 2015

24 
25 _____
MORRISON C. ENGLAND, JR., CHIEF JUDGE
26 UNITED STATES DISTRICT COURT
27
28