

1 BENJAMIN B. WAGNER  
United States Attorney  
2 KEVIN C. KHASIGIAN  
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 \$14,400.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

2:14-CV-02828-GEB-EFB  
REQUEST AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO  
FILE JOINT STATUS REPORT

17 The United States requests that the Court continue the deadline to file a Joint Status Report  
18 (“JSR”) from February 9, 2015 to April 10, 2015. For the reasons set forth below, there is good cause  
19 to continue the deadline to file a JSR.

20 **Introduction**

21 On December 3, 2014, the United States filed a civil forfeiture complaint against the above-  
22 captioned currency (“defendant currency”) based on its alleged involvement in federal drug law  
23 violations. All known potential claimants to the defendant property were served in a manner consistent  
24 with *Dusenbery v. United States*, 534 U.S. 161, 168 (2002) and the applicable statutory authority.  
25 Additionally, public notice on the official internet government forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov),  
26 began on December 19, 2014 and ran for thirty consecutive days, as required by Rule G(4)(a)(iv)(C) of  
27 Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.  
28 To date, no party has filed a claim or answer in this case.

1 The United States intends in the near future to obtain a Clerk's default against potential claimant Cliff  
2 A. Charpentier.

3 **Good Cause**

4 For these reasons, the United States seeks to continue the deadline to file a Joint Status Report  
5 from February 9, 2015 to April 10, 2015, or to another date the Court deems appropriate.

6 Dated: 2/2/15

BENJAMIN B. WAGNER  
United States Attorney

7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

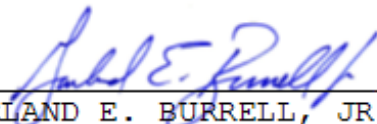
9  
10 **[PROPOSED] ORDER**

11 Pursuant to the United States' request and good cause appearing, the Court makes the following  
12 order:

13 The pretrial scheduling conference, currently scheduled for February 23, 2015, is rescheduled  
14 for May 4, 2015, at 9:00 a.m. A joint status report shall be filed fourteen days prior to the hearing.

15 **IT IS SO ORDERED.**

16 Dated: February 2, 2015

17  
18   
19 \_\_\_\_\_  
20 GARIAND E. BURRELL, JR.  
Senior United States District Judge