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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$227,555.00 IN U.S.
CURRENCY, et al.,
15 Defendants.
16

2:17-CV-01204-WBS-KJN
UNITED STATES' REQUEST TO
EXTEND THE DEADLINE TO
SUBMIT A JOINT STATUS REPORT
FROM SEPTEMBER 26, 2017 TO
DECEMBER 26, 2017

17 The United States submits the following Request to Extend the Deadline to file a Joint Status
18 Report from September 26, 2017 to December 26, 2017.

19 **Introduction**

20 On June 8, 2017, the United States filed a civil forfeiture complaint *in rem* against the above-
21 captioned currency (“defendant currency”), based on its involvement in federal drug law violations. All
22 known potential claimants to the defendant currency were served in a manner consistent with *Dusenbery*
23 *v. United States*, 534 U.S. 161, 168 (2002) and the applicable statutory authority. Additionally, public
24 notice on the official internet government forfeiture site, www.forfeiture.gov, began on June 16, 2017,
25 and ran for thirty consecutive days, as required by Rule G(4)(a)(iv)(C) of Supplemental Rules for
26 Admiralty or Maritime Claims and Asset Forfeiture Actions. A Declaration of Publication was filed on
27 July 17, 2017.

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1 **Good Cause**

2 The United States has provided notice to all potential claimants pursuant to law. Specifically,
3 the United States served a copy of the complaint documents to potential claimants Daniel Munoz Acosta
4 and Ruby Delgadillo via certified and first class mail as well as personal service, but neither have filed a
5 claim. At this point, the time to file a claim and enter the case has expired.

6 Accordingly, the United States requested a Clerk's Default against Daniel Munoz Acosta and
7 Ruby Delgadillo and the Court entered a Clerk's Certificate of Entry of Default for Daniel Munoz
8 Acosta on July 21, 2017 and a Clerk's Certificate of Entry of Default for Ruby Delgadillo on August 17,
9 2017. The United States has filed a motion for default judgment and final judgment of forfeiture with
10 the Court and such filings, if/when granted, would terminate the case.

11 No other party has entered this case.

12 For these reasons, the United States seeks to continue the deadline to file a Joint Status Report to
13 December 26, 2017 (or to another date the Court deems appropriate).

14 Thus, there is good cause to extend the deadline to file a joint status report in this case from
15 September 26, 2017 to December 26, 2017, or to a date the Court deems appropriate.

16 Dated: 9/22/2017

PHILIPP A. TALBERT
United States Attorney

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


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20 **ORDER**

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

23 The Scheduling Conference is continued to **January 16, 2018 at 1:30 p.m.** The deadline to file
24 a Joint Status Report currently due on September 26, 2017 is extended to **January 2, 2018.**

25 **IT IS SO ORDERED.**

26 Dated: September 22, 2017

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WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE