

1 MELINDA HAAG (CABN 132612)
 United States Attorney

2 DAVID R. CALLAWAY (CABN 121782)
 Chief, Criminal Division

3

4 PATRICIA J. KENNEY (CABN 130238)
 Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
 6 San Francisco, California 94102-3495
 Telephone: 415.436.6857
 7 Facsimile: 415.436.7234
 Email: patricia.kenney@usdoj.gov

8 Attorneys for the United States of America

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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

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15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 \$209,815 IN UNITED STATES CURRENCY,

19 Defendant.

CASE NO. 14-0780 SC

STIPULATION AND ORDER OF
 THE PARTIES RE: SCHEDULING

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21 JULIO FIGUEROA,

22 Claimant.

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1 On April 28, 2015, the Court denied the motion of the United States to strike and ordered that the
2 parties complete general discovery in 75 days (by July 10, 2015), identify experts within 14 days (by
3 July 24, 2015) thereafter, identify rebuttal experts within 21 days (by August 14, 2015) thereafter, and
4 complete expert discovery within 31 days (by September 14, 2015) thereafter. Subsequently, claimant
5 filed a motion for summary judgment on May 1, 2015 which is scheduled for a June 12, 2015 hearing
6 and suggested that the parties stay discovery until his motion is resolved. Although the United States submits
7 there is no need to stay discovery pending claimant's motion and can conclude discovery by July 10,
8 2015 as ordered, the United States does not object to a stay providing the previously set time limits are
9 proportionately extended.

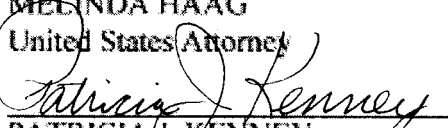
10 Accordingly, the parties stipulate and agree, subject to the Court's approval, that the following
11 deadlines will apply following the Court's ruling on claimant's motion for summary judgment:

- 12 1. The parties have 75 days to complete discovery from the date of the Court order resolving
13 claimant's motion.
- 14 2. The parties call the clerk to schedule a case management conference approximately two
15 weeks before the close of discovery.
- 16 3. The parties have 14 days from the close of discovery to identify experts.
- 17 4. The parties have 21 days from the identification of expert witnesses to identify rebuttal
18 expert witnesses.
- 19 5. The parties have 30 days from the identification of rebuttal expert witnesses to complete
20 expert discovery.

21 IT IS SO STIPULATED:

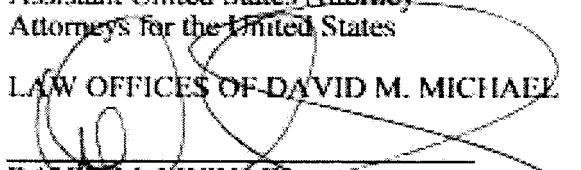
22 Dated: May 7, 2015

MELINDA HAAG
United States Attorney


PATRICIA J. KENNEY
Assistant United States Attorney
Attorneys for the United States

23 Dated: May 2, 2015

LAW OFFICES OF DAVID M. MICHAEL


DAVID M. MICHAEL
EDWARD M. BURCH
Attorneys for Julio Figueroa

24 PURSUANT TO THE FOREGOING, IT IS SO ORDERED AND THE PARTIES SHALL FOLLOW
25 THE AGREED UPON SCHEDULING DATES AS SET FORTH IN THE STIPULATION ABOVE.

26 Dated: May 13, 2015


THE HONORABLE SAMUEL CONTI
United States District Judge

27 Stip & Order Re: Scheduling
28 NO. 14-CV-00780 SC