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11 United States Attorney
12 *Of Counsel*

13 *Attorneys for Plaintiff*

14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 LISA ZAVIEH, individually, as the successor-
21 in-interest to Amir Zavieh, and as the distributee
22 of the Estate of Amir Zavieh, a/k/a Allen Zavieh,

23 Defendants.

Case No. 4:17-cv-3286-KAW

**STIPULATION AND ~~PROPOSED~~
ORDER TO ENLARGE NON-
EXPERT DISCOVERY DEADLINE**

24 The United States of America and Lisa Zavieh, by and through undersigned counsel,
25 hereby stipulate and request that the non-expert discovery deadline currently scheduled for July
26 6, 2018 be enlarged to August 6, 2018, and state as follows:

27 1. On January 25, 2018, the Court entered a Case Management and Pretrial Order
28 for Bench Trial (Docket No. 46).

1 2. Per the Court's Order, non-expert discovery shall be completed by July 6, 2018
2 and expert discovery shall be completed by August 6, 2018 (Docket No. 46).

3 3. The United States believes that it will be necessary to depose Martin Lack, who
4 advised Amir Zavieh regarding his Swiss bank account. Mr. Lack currently resides abroad, but is
5 willing to voluntarily appear for a deposition to be taken in Washington, D.C.

6 4. To accommodate Mr. Lack and counsel for Ms. Zavieh's travel schedules, the
7 United States requests that the non-expert discovery deadline be extended to August 6, 2018.

8 5. Undersigned counsel for the United States has conferred with undersigned
9 counsel for Ms. Zavieh and Ms. Zavieh agrees to this request.

10 6. This is the parties' first stipulation for an extension of the non-expert discovery
11 deadline.

12 7. This request will not affect the schedule for the case.

13 WHEREFORE, the Parties hereby stipulate and request to enlarge the non-expert
14 discovery deadline to August 6, 2018.

15 Respectfully submitted this 14th day of February, 2018.

16 RICHARD E. ZUCKERMAN
17 Principal Deputy Assistant Attorney General

SIDEMAN & BANCROFT LLP

18 /s/ Yael Bortnick
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/s/ Jay R. Weill
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, and for good cause shown, IT IS HEREBY ORDERED that the non-expert discovery deadline is enlarged to August 6, 2018.

SO ORDERED this 20th day of February, 2018.



HON. KANDIS A. WESTMORE
United States Magistrate Judge