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9

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 \$158,677.17 in United States Currency,  
16 \$761,515.36 in United States Currency, and  
\$844,586.92 in United States Currency,

17 Defendants.

2:12-CV-2125-JAD-VCF

2:12-CV-2126-JAD-VCF

2:12-CV-2127-JAD-VCF

**Order Granting**

**William Richardson's and Harvey  
Vechery's Unopposed Motion to Extend  
Time to File Richardson's Rule 12(b)  
Motion or Answer and Vechery's Judicial  
Claim and Rule 12(b) Motion or Answer  
(Second Extension)**

ECF No. 51

18 This Motion to Extend Time is the second request. LR IA 6-1.

19 William Richardson (Richardson) and Harvey Vechery (Vechery) requested the first  
20 extension to, and including, April 20, 2020, ECF No. 35. This Court granted the extension,  
21 ECF No. 38. Richardson and Vechery respectfully move this Court for a Second Order  
22 extending the time for Richardson to file his Rule 12(b) Motion or Answer and for Vechery  
23 to file his Judicial Claim and Rule 12(b) Motion or Answer to and including June 30, 2020.  
24 The parties hope the settlement can be completed before that date. The reason is the  
25 government, Richardson, and Vechery have made progress in settling the civil forfeiture in  
26 rem action and the criminal litigation. The next step in the settlement process is that based  
27 on Richardson's signed Stipulation and Petition for Remission and Mitigation under the  
28 exclusive executive branch procedure for potential settlement only, Vechery's signed

1 Stipulation and Petition for Remission and Mitigation under the exclusive executive branch  
2 procedure for potential settlement only, the government will prepare documents and  
3 memorandums that have five levels of review that ends with the Chief of Money  
4 Laundering Asset Recovery Section, Criminal Division, United States Department of  
5 Justice, for preapproval of the exclusive executive branch Petitions for Remission and  
6 Mitigation in the civil forfeiture case.<sup>1</sup>

7 For the first extension of time, the government consented to the extension of time at  
8 the request of David Chesnoff, counsel for Richardson, on December 18, 2019, and  
9 consented to the extension of time at the request of Patricia Lee, counsel for Vechery, on  
10 December 23, 2019.

11 The government consented to this second extension of time as requested by Patricia  
12 Lee for Vechery and David Chesnoff for Richardson on April 14, 2020.

13 This Motion is not submitted solely for the purpose of delay or for any other  
14 improper purpose.

15 This Court should grant an extension of time to, and including, June 30, 2020.

16 Dated: April 15, 2020.

17 NICHOLAS A. TRUTANICH  
18 United States Attorney  
19 /s/ Daniel D. Hollingsworth  
20 DANIEL D. HOLLINGSWORTH  
21 Assistant United States Attorney

22 IT IS SO ORDERED:

23   
24 HONORABLE JENNIFER A. DORSEY  
25 UNITED STATES DISTRICT JUDGE

26 DATED: 4-24-2020

27 *nunc pro tunc to 4-20-2020*

28 <sup>1</sup> 21 U.S.C. § 853(i)(1); 18 U.S.C. §§ 981(e)(6) and 1963(g)(1); *MacInnes*, 223 F. App'x at 553  
n.3 (explaining that the statutes and the CFR authorize the attorney general to determine  
whether to provide relief to victims); *United States v. Carter*, 742 F.3d 440, 446 (9th Cir. 2014)  
(explaining that “the Government may choose to assign forfeited proceeds to victims ....”);  
*DSI*, 496 F.3d at 181-82; 28 CFR Part 9; see *Government's Response*, ECF No. 373, to *Harvey*  
*Vechery's Motion to Intervene*, ECF No. 361.