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 9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,)	
)	
12 Plaintiff,)	Case Nos: 2:13-CV-00100-(APG)-(CWH)
)	And
13 v.)	2:13-CV-00947-(JCM)-(GWF)
)	
14 \$1,002,327.00 IN UNITED STATES)	
CURRENCY, et. al.,)	
)	
15 Defendants.)	

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 17 **PARTIES STIPULATED MOTION TO CONTINUE THE DISCOVERY**

18 COME NOW the parties, the plaintiff United States of America, by and through the United
 19 States Attorney for the District of Nevada, and the Claimants by and through their attorneys David
 20 McGee and Gregory Miller, and moves this Court to grant a continuance of discovery in the above-
 21 referenced matters for 90 days, or until September 15, 2015. Discovery cut-off in these cases is June 15,
 22 2015. For their grounds, the parties jointly represent that they have been engaged in “paper” and
 23 deposition discovery to date. Currently the parties are engaged in discovery disputes that are under
 24 consideration by this Court. Once those disputes have been resolved, discovery can resume. Resolution
 25 of those discovery issues is not likely to occur before the discovery cut-off of June 15, 2015.
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1 On June 9, 2015, Counsel for the Claimants, David McGee, sent an e-mail to the undersigned
2 counsel for the Government, giving his (Mr. McGee's) consent on behalf of the Claimants to continue
3 the discovery cut-off deadline for an additional 90 days or until September 15, 2015.

4 This motion is not submitted solely for the purpose to delay or for any other improper purpose.

5 WHEREFORE, the United States moves this Court to grant a 90-day continuance, or until
6 September 15, 2015, to complete discovery.

7 DATED this 12th day of June 2015.

8 Respectfully submitted,

9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/Michael A. Humphreys
12 MICHAEL A. HUMPHREYS

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15 IT IS SO ORDERED:

16 George Foley Jr.
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: June 15, 2015
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Via CM/ECF

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