

1 DANIEL G. BOGDEN
 United States Attorney
 District of Nevada

3 MICHAEL A. HUMPHREYS
 Assistant United States Attorney
 4 333 Las Vegas Boulevard South, Suite 5000
 Las Vegas, Nevada 89101
 5 Telephone: 702-388-6336
 Facsimile: 702-388-6787
 6 Email: Michael.humphreys@usdoj.gov

7 Attorneys for the United States of America

8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,)
)
 12 Plaintiff,)
)
 13 v.) 2:14-CV-101-APG-(CWH)
)
 14 1975 GRUMMAN AMERICAN G-1159)
 AIRPLANE, SERIAL NO. 157)
 15 TAIL REGISTRATION NO. N468HW,)
)
 16 1969 GRUMMAN AMERICAN G-1159)
 AIRPLANE, SERIAL NO. 50)
 17 TAIL REGISTRATION NO. N650KA,)
)
 18)
 Defendants.)

19

20 **UNITED STATES' FIFTH MOTION TO**
EXTEND CAFRA DEADLINE TO FILE COMPLAINT

21 The United States of America by and through Daniel G. Bogden, United States Attorney for
 22 the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully
 23 moves this Court to grant a five day extension, or until May 2, 2014, to file its forfeiture complaint,
 24 *in rem* in the above-captioned action. The CAFRA deadline for the Government to file its complaint
 25 is currently April 28, 2014. On April 21, 1014, this Court granted a brief continuance of this matter
 26 until April 28, 2014.

1 For its grounds, the United States says that the parties to this action, the United States of
2 America, plaintiff, and the Claimant, Ford Electric, have reached a verbal agreement to settle the
3 case, but need an additional few days to allow the verifying agent to review the complaint and sign
4 the verification on behalf of the Government. All forfeiture complaints must be verified pursuant to
5 Fed. R. Civ. P, Supp. Rule G (2)(a). The verifying agent is located in Houston, Texas but will be out
6 of his Texas office until Wednesday April 30, 2014 and cannot verify the complaint before that date.
7 Once the agent verifies the forfeiture complaint, the complaint can be filed, as well as the settlement
8 stipulation, the terms of which, to date, all parties have agreed to. The parties will then present the
9 settlement stipulation to this Court for review and approval.

10 The undersigned has discussed this matter with Claimant's counsel, Paul Padda, and he has
11 given Government counsel consent to inform this Court that he does not oppose this five-day
12 extension.

13 WHEREFORE, the United States moves this Court to grant its motion to extend the time for
14 the United States to file its complaint in this matter for an additional five (5) days; or until May 2,
15 2014.

16 DATED this 28th day of April 2014.

17 Respectfully submitted,

18 DANIEL G. BOGDEN
19 United States Attorney

20 /s/Michael A. Humphreys
21 MICHAEL A. HUMPHREYS
22 Assistant United States Attorney

23 IT IS SO ORDERED:

24 
25 _____
26 UNITED STATES MAGISTRATE JUDGE

DATED: April 29, 2014