

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

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

11 UNITED STATES OF AMERICA,	)	
	)	
12 Plaintiff,	)	
	)	
13 v.	)	Case No. 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 **UNITED STATES' THIRD MOTION TO**  
 20 **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 thirty day extension, or until April 21, 2014, to file its forfeiture  
 24 complaint, *in rem* in the above-captioned action. The CAFRA deadline for the Government to file  
 25 its complaint is currently March 21, 2014. This Court granted a second continuance on this matter  
 26 thirty days ago.

1 For its grounds, the United States says that the undersigned Assistant United States Attorney  
2 assigned to this case is still evaluating the case to determine the viability of filing a civil action. In  
3 addition, counsel for the Government and counsel for the putative claimant have scheduled a face-to-  
4 face meeting during the week of March 30, 2014, in an effort to resolve their differences in this case.  
5 Since being assigned this case, Government counsel has reviewed hundreds of documents and has  
6 spoken with experts and interested parties from two separate agencies: the DEA and the Federal  
7 Aviation Administration. Government Counsel expects to complete its review of this matter within  
8 the next thirty days and to make a decision about whether to file by then.

9 The undersigned has discussed this matter with Claimant's counsel, George Crow, and he has  
10 given Government counsel consent to inform this Court that while he does not stipulate to this  
11 continuance he will not oppose it.

12 WHEREFORE, the United States moves this Court to grant its motion to extend the time for  
13 the United States to file its complaint in this matter for an additional thirty (30) days; or until April  
14 21, 2014.

15 DATED this 21st day of March 2014.

16 Respectfully submitted,

17 DANIEL G. BOGDEN  
18 United States Attorney

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

22 IT IS SO ORDERED:

23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: March 24, 2014