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

10 UNITED STATES OF AMERICA,)
 11 Plaintiff,)
 12 v.) Case No.:
 13 \$32,000.00 IN UNITED STATES CURRENCY,)
 14 Defendant.)
 15

16 **UNITED STATES' UNOPPOSED APPLICATION TO**
 17 **CONTINUE THE CAFRA DEADLINE**
 18 **FOR THE UNITED STATES TO FILE ITS COMPLAINT**

19 The United States of America ("United States"), by and through Daniel G. Bogden, United
 20 States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States
 21 Attorney, respectfully moves this Court to grant an extension of time, until and including May 4,
 22 2012, for the United States to file its complaint in the above-captioned matter. The CAFRA deadline
 for the United States is March 5, 2012.

23 Under CAFRA, the United States is obliged to file its Complaint for Forfeiture within 90
 24 days of receiving a referral from the agency that has received an administrative claim. 18 U.S.C.
 25 983(a)(3)(A). That same section allows the 90-day deadline to be extended by stipulation of the
 26 parties as authorized by the court.

1 In this case, the Government continues to investigate this matter to ascertain the basis for
2 seizure that has led to the filing of an administrative claim by Justin Johnson. Such investigation
3 will likely be concluded within the next 60 days, whereupon the United States will make a decision
4 about whether to proceed with the judicial process in this matter.

5 Government counsel discussed the matter of a government continuance with Claimant's
6 counsel, Tammy Riggs, on February 29, 2012, and Attorney Riggs gave Government counsel
7 authorization to represent to this Court that she consents to this motion.

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

10 WHEREFORE, the United States moves this Court to grant its application to extend the time
11 for the United States to file its Complaint for Forfeiture in this matter for an additional 60 days, or
12 until May 4, 2012.

13 DATED this 2nd day of March, 2012.

14 Respectfully submitted,

15 DANIEL G. BOGDEN
16 United States Attorney

17 /s/Michael A. Humphreys
18 MICHAEL A. HUMPHREYS

19 IT IS SO ORDERED:

20
21 _____
22 UNITED STATES DISTRICT JUDGE

23
24 DATED: _____
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