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8 **IN THE UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 vs.

14 APPROXIMATELY \$149,900.00 IN US
15 CURRENCY,
16 Defendant.

2:11 -CV-02503-MCE-GGH

**STIPULATION TO CONTINUE
DISCOVERY AND EXPERT DISCLOSURE
DATES; ORDER**

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18 The United States and Claimants, Ryan Monaghan and Maryann Sanders Monaghan, by
19 and through their undersigned attorneys, hereby stipulate:

20 1. This stipulation is executed by an all parties who have appeared and are affected
21 by this action.

22 2. Due to the devastation caused by Hurricane Sandy on October 29, 2012 on
23 Claimant's family home located in Manasquan, New Jersey, which has been declared part of the
24 federal disaster area, the Claimants have been unavailable for deposition in Sacramento,
25 California. It has been necessary for Claimants to remain in New Jersey to help with the family
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1 construction business and the re-construction of the family home. The Claimants expect this
2 reconstruction to continue through February 2013.

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4 3. In addition, Claimant's counsel has three (3) felony jury trials scheduled for
5 January and February 2013 in Sacramento County Superior Court, one of which was continued
6 on November 19, 2012 (in the middle of jury selection) to January 15, 2013 due to the
7 hospitalization of the client of Claimant's counsel. The first realistic available date for the
8 depositions of Claimants and related witnesses will be the week of March 11, 2013.

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10 4. The parties have agreed to set aside March 12, 2013 through March 15, 2013 to
11 complete the depositions of the parties and witnesses noticed by the Government.

12 5. The scheduling dates impacted by the above-mentioned continuances include:

13 a. Discovery to be completed by March 1, 2013. The parties suggest that the date
14 to complete discovery be continued until **May 15, 2013**.

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16 b. Expert Witness Disclosures ordered to be completed by April 1, 2013. The
17 parties suggest that the date to complete Expert Witness Disclosure be continued until **May 15,**
18 **2013**, and the date to complete depositions of expert witnesses be set on **June 15, 2013**.

19 c. The last day to hear dispositive motions is set for August 7, 2013. The parties
20 suggest that the last day to hear dispositive motions be continued to **October 9, 2013**.

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22 6. No other scheduling dates are impacted by this stipulation.

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IT IS SO STIPULATED.

DATED: January 18, 2013

BENJAMIN B. WAGNER
United States Attorney


/s/ Kevin C. Khasigian (as authorized 1/17/13)
KEVIN C. KHASIGIAN
Assistant United States Attorney

DATED: January 18, 2013

/s/ Joseph A. Welch
JOSEPH A. WELCH
Attorney for Claimants, Ryan Monaghan and
Maryann Monaghan

IT IS SO ORDERED.

DATED: February 8, 2013



MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT JUDGE