

1 BENJAMIN B. WAGNER  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States  
6  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MISCELLANEOUS ART, JEWELRY, AND  
CURRENCY LISTED IN EXHIBIT A,

15 Defendants.  
16

2:14-CV-01074-JAM-AC

UNITED STATES' REQUEST TO  
EXTEND THE DEADLINE TO  
FILE JOINT STATUS REPORT  
AND ORDER

17  
18 The United States requests that the Court continue the deadline to file a  
19 Joint Status Report from June 30, 2014 to August 29, 2014.  
20

21 **Introduction**

22 On April 30, 2014, the United States filed a civil forfeiture complaint against the  
23 above-captioned assets ("defendant assets") based on their alleged involvement in  
24 violations of federal law. All known potential claimants to the defendant assets have  
25 signed a stipulation forfeiting their interest in the defendant assets. Additionally, public  
26 notice on the official internet government forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov), began on  
27 May 7, 2014, and ran for thirty consecutive days, as required by Rule G(4)(a)(iv)(C) of  
28

1 Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. A  
2 Declaration of Publication was filed on June 27, 2014.

3 **Good Cause**

4 The United States has diligently pursued its forfeiture case against the defendant  
5 assets. All known potential claimants have stipulated to the forfeiture of the defendant  
6 assets. To date, no party has filed a claim or answer in this case. The United States  
7 intends to file a Request for Final Judgment of Forfeiture along with the executed  
8 stipulation once the publication time has passed.

9 For these reasons, the United States seeks to continue the deadline to file a Joint  
10 Status Report from June 30, 2014 to August 29, 2014, or to another date the Court deems  
11 appropriate.

12 Dated: 6/27/14

BENJAMIN B. WAGNER  
United States Attorney

13  
14 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

15  
16  
17 **ORDER**

18 The Court finds that there is good cause to extend the deadline to file a joint status  
19 report in this case from June 30, 2014 to August 29, 2014.

20 **IT IS SO ORDERED.**

21 Dated: 6/27/2014

/s/ John A. Mendez  
JOHN A. MENDEZ  
United States District Court Judge

Exhibit A

1. "Champagne Tango" Limited Edition, Michael Goddard, Giclee on canvas, signed by artist, Numbered 207/250, 40" X 24" including frame,
2. Marc Chagall Etching "Soleil Aux Amoureux" black & white Limited Edition Etching, signed by artists, Numbered 1 of 60, 12"x 9" including frame,
3. Joan Miro, The Perseides I, 1970, Registration No.147727.0018,
4. Joan Miro, The Perseides III, 1970, Registration No. 147727.0018,
5. Joan Miro, Oda A Joan Miro (C.905), 1973, Registration No. 177246.001,
6. Andras Markos, Abstract XV111, 2000, Registration No. 110777.0000,
7. Scott Jacobs, After the Ride, 2005, Registration No. 151835.0215,
8. Scott Jacobs, Summer Red, 2005, Registration No. 151836.0423,
9. Scott Jacobs, Roses or Red, 2005, Registration No. 151837.0193,
10. Diamond engagement ring, CTR RD, diamond 1.90 CTS., GIA Cert # 10074955, E Color, SI, Plat. Mtg. with 6 top bags Wgt .65 CTS and 2 RD diamonds weighing .30 CTS,
11. Diamond necklace containing 7 diamonds Wgt. 1.10 CTS. G Color, VS2 set in handmade white gold necklace,
12. 668 Pair of diamond St. Earrings - 2 round diamonds weighing Approx. 1.50 CTS., G Color, SI1, set in white gold mounting,
13. Diamond bracelet containing 60 RD diamonds, weighing 3.51 CTS., G Color, VS2, set in 18kt gold channel mounting,
14. Cartier Roadster, stainless steel watch, S/N 699127D,
15. Steel and Gold Rolex with Roman Dial, Model #R0250005, S/N R79173373B6252K79897,
16. Cartier platinum and diamond Star of David Charm Approx. 1.20 CTS. Fiche #007262125, Ref. #HY300021, S/N 869388,
17. 14kt Gold and Onyx Bracelet with interconnecting Marquise stones,
18. Approximately \$4,740.00 in the form of a Cashier's Check in lieu of a Man's diamond ring containing 3 full cut RD. diamonds .74 CTS., Color G, VS2, set in handmade platinum setting,
19. Diamond wedding ring containing 3 full cut RD diamonds .74 CTS, Color G, VS2, set in handmade platinum setting,
20. Diamond Eternity Necklace containing 215 full cut round diamonds weight 2.34 CTS., diamonds are G Color, VS2 set in white gold pave necklace mounting, 17",
21. Pair of diamond stud earrings containing 2 Princess cut diamonds, weighing 2.40 CTS., G-H Color, VS2, set in white gold mappings,
22. Patek Philippe automatic annual calendar watch, black strap, 18kt, white gold case, grey dial, Movement #3131717, Case #4096366,
23. Cartier Tank Francaise Ring Wg-1/2 diamond-Ref B4054750, S/N CR0138,
24. Men's Rolex stainless steel and platinum yacht master watch,
25. Stainless steel Franck Muller Biretro chronograph watch with black alligator strap, Model #7850CCBACB,
26. Jaeger Le-Coultre Men's Grand Reveil watch in platinum, leather strap, Limited Edition, Model Q163644A-12,
27. Panerai Radiomir 45mm chronograph black stainless steel watch Serial #6715PB0569224 Reference #PAM00288,
28. Parmigiani Fleurier stainless steel and black leather chronograph watch, Reference #PF003FLP1,
29. Vacheron Constantin Overseas stainless steel chronograph watch, Model #49150/B01A CAE #1158537,
30. Blancpain stainless steel chrono perpetual calendar watch, Model #2685F1130FI Case #102,
31. IWC Big Pilot platinum watch, Model #500413, Serial #3406085,
32. IWC Mark XVI stainless steel watch, Model #325512, Serial #3355682,
33. Patek Philippe stainless steel watch with diamonds, Model #4910/10A-010, Serial #3592550/4855430,
34. Patek Philippe platinum watch with diamond, Model #5135P-001, Serial #3920424/4455746,
35. Women's Roberto Coin white gold and diamond bracelet,

36. Women's Roberto Coin white gold and diamond bracelet,
37. Roberto Coin Rose gold and diamond bracelet, and
38. Men's Panerai Limior power reserve watch, 2005 Regatta - 125 of 500.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28