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Acting Under Authority
Conferred by 28 U.S.C. § 515
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

M. MARCO GARMO,

Defendant.

Case No.: 19-CR-4768-GPC

**JOINT MOTION TO CONTINUE
HEARING ON PETITION IN
OPPOSITION TO FORFEITURE &
MOTION FOR RETURN OF
PROPERTY**

Date: December 18, 2020

Time: 1:00 p.m.

Honorable Gonzalo P. Curiel

The United States of America, by and through its counsel, Linda A. Frakes, Attorney for the United States acting under authority conferred by 28 U.S.C. §515, Nicholas W. Pilchak and Andrew R. Haden, Assistant United States Attorneys, and the Petitioner, Hollan Garmo, by and through her counsel, Aaron G. Meyer, hereby jointly move the Court to continue the briefing schedule and hearing set on Petitioner's motion and petition, currently set for December 18, 2020 at 1:00 p.m.

1 On November 6, 2020, Petitioner filed a motion for return of property (ECF
2 No. 122) and a petition in opposition to forfeiture (ECF No. 121) based on identical
3 pleadings. The United States disputes Petitioner's arguments and opposes her request
4 for relief, but the parties are discussing whether the motion and petition may be resolved
5 by mutual agreement short of a contested hearing.

6 Accordingly, the parties jointly request that the Court continue the hearing on
7 this matter set for December 18, 2020 at 1:00 p.m. until March 26, 2021 (or another
8 date in late March 2021 convenient for the Court) and defer the briefing schedule for
9 the United States' response until the future hearing. Specifically, the parties request
10 that the United States be ordered to file a response to the petition no later than three
11 weeks prior to the continued hearing.

12 DATED: 11/25/2020

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16 /s/ Nicholas W. Pilchak
NICHOLAS W. PILCHAK
ANDREW R. HADEN
Assistant U.S. Attorneys
Attorneys for Plaintiff
United States of America

20 DATED: 11/25/2020

22 /s/ Aaron G. Meyer
AARON G. MEYER
Attorney for Petitioner
Hollan Garmo
(by consent)