

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 19-CR-20693-SEITZ

UNITED STATES OF AMERICA

Plaintiff

vs.

PETER SOTIS, et.al,

Defendants

RAMAS LLC,

Petitioner.

_____ /

**JOINT MOTION TO EXTEND DEADLINE FOR RAMAS LLC TO FILE
ITS ANCILLARY PETITION**

The Parties, the United States of America, Plaintiff, and Ramas LLC, claimant to the rebreathers that are the subject of this Court's Preliminary Order of Forfeiture (DE-114) respectfully file this motion requesting an extension of time of 30 days, pursuant to Local Rule 88.9 and 21 U.S.C. Sec. 853(n), within which Ramas LLC may file its ancillary petition claiming the rebreathers. In support of this motion, the parties state the following:

1. Ramas LLC purchased from Add Helium and paid for the rebreathers that are the subject of this Court's preliminary order of forfeiture. Ramas LLC maintains it is the owner thereof.

2. Ramas LLC received notice of the preliminary order of forfeiture on January 28, 2022. Pursuant to 21 U.S.C. Sec. 853(n), its Ancillary Petition requesting a hearing on its claim to the rebreathers would be due on February 28, 2022.
3. The parties have been in discussions regarding Ramas LLC's claim to the rebreathers and are working toward a possible out of court resolution of Ramas LLC's claim. The parties believe that a 30 day extension of time for Ramas LLC to file its ancillary petition may be helpful in continuing those discussions, and if fruitful, will save the parties the time and expense of filing such petition, the Government having to respond thereto, and will save the Court time in having to adjudicate Ramas LLC's claim.
4. The parties jointly make this request for an extension of time in good faith and without the intent to create any undue delay.

WHEREFORE, the parties jointly request that this motion be granted, and that Ramas LLC have until and including March 30, 2022 within which to file its Ancillary Petition.

Dated: February 16, 2022.

Respectfully Submitted,

FOR RAMAS LLC

BECERRA LAW, P.A.

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