

**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.

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

The Parties, the United States of America, Plaintiff, and Ramas LLC, a claimant to the rebreathers that are the subject of this Court's Preliminary Order of Forfeiture (DE-114) respectfully file this second 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. On February 16, 2022, This Court granted the parties' joint motion to extend the deadline within which Ramas LLC was to file its ancillary petition to March 30, 2022. (DE-167, 169).

3. The parties have been in discussions regarding Ramas LLC's claim to the rebreathers, including regarding a potential competing claim to the rebreathers and are diligently working toward a possible out of court resolution of Ramas LLC's claim. The parties believe that another 30-day extension of time for Ramas LLC to file its ancillary petition may be helpful in continuing those discussions to resolve this forfeiture, 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 a second extension of time in good faith and without the intent to create any undue delay.

Dated: March 28, 2022.

Respectfully Submitted,

FOR RAMAS LLC

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