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

10

11 UNITED STATES OF AMERICA,  
 12 Plaintiff,

13 v.

14 APPROXIMATELY  
 15 \$10,130.00 IN U.S. CURRENCY,  
 16 Defendant.

) 1:08-MC-00042-AWI

) **STIPULATION AND ORDER**  
 ) **EXTENDING THE UNITED STATES'**  
 ) **TIME TO FILE A COMPLAINT FOR**  
 ) **FORFEITURE AND/OR TO OBTAIN AN**  
 ) **INDICTMENT ALLEGING FORFEITURE**

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18 It is hereby stipulated by and between the United States of America and Claimants Hajjaj  
 19 Hasan Hajjaj and Faten Hajjaj, ("Claimants"), by and through their respective attorney, as  
 20 follows:

21 1. On or about September 15, 2008, Claimants filed a claim with the Drug  
 22 Enforcement Administration with respect to the above-referenced approximately \$10,130.00 (the  
 23 "currency") which was seized on or about June 5, 2008.

24 2. The Drug Enforcement Administration has sent written notice of intent to forfeit  
 25 as required by 21 U.S.C. § 881 to all known interested parties. The time has expired for any  
 26 person to file a claim to the currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
 27 than the Claimants has filed a claim to the currency in the administrative forfeiture proceeding.

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1           3.       Title 18 U.S.C. § 983(a)(3)(A) requires the United States to file a complaint for  
2 forfeiture against the currency and/or to obtain an indictment alleging that the currency is subject  
3 to forfeiture within 90 days after a claim has been filed in the administrative forfeiture  
4 proceedings, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties.

6           4.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend  
7 to May 13, 2009, the time in which the United States is required to file a civil complaint for  
8 forfeiture against the currency and/or to obtain an indictment alleging that the currency is subject  
9 to forfeiture.

10          5.       Accordingly, the parties agree that the deadline by which the United States shall  
11 be required to file a complaint for forfeiture against the currency and/or to obtain an indictment  
12 alleging that the currency is subject to forfeiture shall be extended to May 13, 2009.

13 Dated: February 5, 2009

LAWRENCE G. BROWN  
Acting United States Attorney

16                   /s/ Deanna L. Martinez  
DEANNA L. MARTINEZ  
Assistant United States Attorney

19 Dated: February 9, 2009

20                   /s/ Daniel A. Bacon  
DANIEL A. BACON  
Attorney for Claimants  
Hasan Hajjaj and Faten Hajjaj  
22                   (original signature retained by attorney)

24                   **ORDER**

25 IT IS SO ORDERED.

26 Dated: February 13, 2009

/s/ Anthony W. Ishii  
CHIEF UNITED STATES DISTRICT JUDGE