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Attorneys for Plaintiff

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

UNITED STATES OF AMERICA, ) 1:10-MC-00044-AWI

Plaintiff, )

v. )

APPROXIMATELY \$7,562.00 IN U.S.  
 CURRENCY; )

1972 OLDSMOBILE 442, NO LICENSE  
 PLATE, VIN: 3J67K2M211271; )

1965 FORD MUSTANG, NO LICENSE  
 PLATE, VIN: 5R07A128707; )

2008 CHEVROLET MALIBU, LICENSE:  
 6LFA733, VIN: 1G1ZG57B88F193345; )

2006 LEXUS GS300, LICENSE: 5MJJ752,  
 VIN: JTHBH96S765000098; )

1969 CHEVROLET TRUCK, NO LICENSE  
 PLATE, VIN: CE149Z825738; )

1962 CHEVROLET IMPALA, NO LICENSE  
 PLATE, VIN: 2186F302848; )

1976 HARLEY DAVIDSON  
 MOTORCYCLE, LICENSE: 15U3097,  
 VIN: 9D18597H6; )

1965 FORD MUSTANG, LICENSE:  
 CZW446, VIN: 5R07C177883; )

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

1 2007 PONTIAC G6, LICENSE: 6HQG262, )  
VIN: 1G2ZH58N974231581; )  
2 )  
3 2008 PONTIAC G6, LICENSE: 6LTN600, )  
VIN: 1G2ZM577184198639; and, )  
4 )  
5 2007 CHEVROLET TRUCK, LICENSE: )  
8K96671, VIN: 3GCEC13C07G549423, )  
6 Defendants. )

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7 It is hereby stipulated by and between the United States of America and Potential Claimants  
8 Nasry Khalid Dablan, Edwan Khalid Dablan, and Nabila Dablan, by and through their attorney, as  
9 follows:

10 1. On or about July 12, 2010, Potential Claimant Edwan Khalid Dablan filed a claim  
11 in the administrative forfeiture proceeding with the Drug Enforcement Administration (“DEA”) with  
12 respect to the approximately \$7,562.00 in U.S. Currency, which was seized on or about April 30,  
13 2010.

14 2. On or about August 2, 2010, Potential Claimant Nasry Khalid Dablan filed a claim  
15 in the administrative forfeiture proceeding with the Internal Revenue Service (“IRS”) with respect  
16 to the 2007 Chevrolet Truck, License: 8K96671, VIN: 3GCEC13C07G549423, which was seized  
17 on or about April 30, 2010.

18 3. On or about August 2, 2010, Potential Claimant Edwan Khalid Dablan filed a claim  
19 in the administrative forfeiture proceeding with the Internal Revenue Service (“IRS”) with respect  
20 to the 1972 Oldsmobile 442, No License Plate, VIN: 3J67K2M211271, 1965 Ford Mustang, No  
21 License Plate, VIN: 5R07A128707, 2008 Chevrolet Malibu, License: 6LFA733, VIN:  
22 1G1ZG57B88F193345, 2006 Lexus GS300, License: 5MJJ752, VIN: JTHBH96S765000098, 1969  
23 Chevrolet Truck, No License Plate, VIN: CE149Z825738, 1962 Chevrolet Impala, No License Plate,  
24 VIN: 2186F302848, 1976 Harley Davidson Motorcycle, License: 15U3097, VIN: 9D18597H6, 1965  
25 Ford Mustang, License: CZW446, VIN: 5R07C177883, 2007 Pontiac G6, License: 6HQG262, VIN:  
26 1G2ZH58N974231581, which were seized on or about April 28, 2010.

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1           4.       On or about August 2, 2010, Potential Claimant Nabila Dablan filed a claim in the  
2 administrative forfeiture proceeding with the Internal Revenue Service (“IRS”) with respect to the  
3 2008 Pontiac G6, License: 6LTN600, VIN: 1G2ZM577184198639, which was seized on or about  
4 April 28, 2010.

5           5.       The Internal Revenue Service and Drug Enforcement Administration have sent the  
6 written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested  
7 parties. The time has expired for any person to file a claim to the currency under 18 U.S.C. §  
8 983(a)(2)(A)-(E), and no person other than the Potential Claimants have filed a claim to the above-  
9 captioned assets as required by law in the administrative forfeiture proceeding.

10          6.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
11 forfeiture against the above-captioned assets and/or to obtain an indictment alleging that the above-  
12 captioned assets are subject to forfeiture within 90 days after a claim has been filed in the  
13 administrative forfeiture proceedings, unless the court extends the deadline for good cause shown  
14 or by agreement of the parties.

15          7.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
16 January 6, 2011, the time in which the United States is required to file a civil complaint for forfeiture  
17 against the above-captioned assets and/or to obtain an indictment alleging that the above-captioned  
18 assets are subject to forfeiture.

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1           8.       Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the above-captioned assets and/or to obtain an  
3 indictment alleging that the above-captioned assets are subject to forfeiture shall be extended to  
4 January 6, 2011.

5 Dated: October 8, 2010

BENJAMIN B. WAGNER  
United States Attorney

6  
7                   /s/ Deanna L. Martinez  
8                   DEANNA L. MARTINEZ  
9                   Assistant United States Attorney

10 Dated: October 8, 2010

11                   /s/ Daniel Bacon  
12                   DANIEL BACON  
13                   Attorney for Potential Claimants  
14                   Nasry Khalid Dablan, Edwan Khalid Dablan, and  
15                   Nabila Dablan  
16                   (Original signature retained by attorney)

17 IT IS SO ORDERED.

18 Dated: October 15, 2010

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20                   \_\_\_\_\_  
21                   CHIEF UNITED STATES DISTRICT JUDGE  
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