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6 Attorneys for Plaintiff the United States of America  
7

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 \$7,562.00 IN U.S. )  
CURRENCY; )  
15 1972 OLDSMOBILE 442, NO LICENSE )  
16 PLATE, VIN: 3J67K2M211271; )  
17 1965 FORD MUSTANG, NO LICENSE )  
PLATE, VIN: 5R07A128707; )  
18 2008 CHEVROLET MALIBU, LICENSE: )  
19 6LFA733, VIN: 1G1ZG57B88F193345; )  
20 2006 LEXUS GS300, LICENSE: 5MJJ752, )  
VIN: JTHBH96S765000098; )  
21 1969 CHEVROLET TRUCK, NO LICENSE )  
22 PLATE, VIN: CE149Z825738; )  
23 1962 CHEVROLET IMPALA, NO LICENSE )  
PLATE, VIN: 2186F302848; )  
24 1976 HARLEY DAVIDSON )  
25 MOTORCYCLE, LICENSE: 15U3097, )  
VIN: 9D18597H6; )  
26 1965 FORD MUSTANG, LICENSE: )  
27 CZW446, VIN: 5R07C177883; )  
28 2007 PONTIAC G6, LICENSE: 6HQG262, )

1:10-MC-00044-AWI

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

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

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

6  
 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: 6HQQ262, VIN:  
 26 1G2ZH58N974231581, which were seized on or about April 28, 2010.

27 4. On or about August 2, 2010, Potential Claimant Nabila Dablan filed a claim in the  
 28 administrative forfeiture proceeding with the Internal Revenue Service (“IRS”) with respect to the

1 2008 Pontiac G6, License: 6LTN600, VIN: 1G2ZM577184198639, which was seized on or about  
2 April 28, 2010.

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

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

13 7. By Stipulation and Order filed on October 19, 2010, the parties stipulated to extend  
14 to January 6, 2011, the time in which the United States is required to file a civil complaint for  
15 forfeiture against the above-captioned assets and/or to obtain an indictment alleging that the above-  
16 captioned assets are subject to forfeiture.

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

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1 9. 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 April 6, 2011.

5 Dated: January 5, 2011

BENJAMIN B. WAGNER  
United States Attorney

6  
7 /s/ Kelli L. Taylor  
8 KELLI L. TAYLOR  
Assistant U.S. Attorney

9  
10 Dated: January 4, 2011

/s/ Anthony P. Capozzi  
11 ANTHONY P. CAPOZZI  
Attorney for Potential Claimants  
12 Nasry Khalid Dablan, Edwan Khalid Dablan, and  
13 Nabila Dablan  
(Original signature retained by attorney)

14 **ORDER**

15  
16 IT IS SO ORDERED.

17 Dated: January 7, 2011

18   
CHIEF UNITED STATES DISTRICT JUDGE