

1 BENJAMIN B. WAGNER
United States Attorney
2 JEFFREY A. SPIVAK
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900
5

6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY 13,720.00 IN U.S.
CURRENCY,
15 Defendant.
16

CASE NO. 1:14-MC-00004-LJO

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

17 It is hereby stipulated by and between the United States of America and Claimant
18 Aaron Brown (hereafter "Claimant"), by and through his respective attorney, as follows:

19 1. On or about October 28, 2013, Claimant filed a claim, in the administrative
20 forfeiture proceeding, with the United States Drug Enforcement Administration with
21 respect to the approximately \$13,720.00 in U.S. Currency (hereafter "currency"), which
22 was seized on or about June 11, 2013.

23 2. The United States Drug Enforcement Administration sent the written notice
24 of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties.
25 The time has expired for any person to file a claim to the currency under 18 U.S.C. §
26 983(a)(2)(A)-(E), and no person other than the Claimant has filed a claim to the currency
27 as required by law in the administrative forfeiture proceeding.

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

6 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
7 extend to March 25, 2014, the time in which the United States is required to file a civil
8 complaint for forfeiture against the currency and/or to obtain an indictment alleging that
9 the currency is subject to forfeiture.

10 5. Accordingly, the parties agree that the deadline by which the United States
11 shall be required to file a complaint for forfeiture against the currency and/or to obtain an
12 indictment alleging that the currency is subject to forfeiture shall be extended to March
13 25, 2014.

14 Dated: January 22, 2014

BENJAMIN B. WAGNER
United States Attorney

16 By: /s/ Jeffrey A. Spivak
17 JEFFREY A. SPIVAK
Assistant United States Attorney

19 Dated: January 22, 2014

20 By: /s/ J. Allen Crumpler III
21 J. ALLEN CRUMPLER III
Attorney for Claimant Aaron Brown
(Original signature retained by attorney)

22
23 IT IS SO ORDERED.

24 Dated: January 27, 2014

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE