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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$47,495.00 IN U.S.
 CURRENCY,
 15 Defendant.

1:14-MC-00076-LJO

**STIPULATION AND ORDER
 EXTENDING TIME FOR
 FILING 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
 19 claimant Dady Lu Thongthipvoravong (“Claimant”), by and through their respective
 20 counsel, as follows:

21 1. On or about August 23, 2013, Claimant filed a claim in the administrative
 22 forfeiture proceedings with the Drug Enforcement Administration with respect to the
 23 approximately \$47,495.00 in U.S. Currency (hereafter “Defendant Currency”), which
 24 was seized on or about May 27, 2014.

25 2. The Drug Enforcement Administration has sent the written notice of
 26 intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties.
 27 The time has expired for any person to file a claim to the Defendant Currency under 18
 28 U.S.C. § 983(a)(2)(A)-(E), and no person other than Claimant has filed a claim to the

1 Defendant Currency as required by law in the administrative forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a
3 complaint for forfeiture against the Defendant Currency and/or to obtain an indictment
4 alleging that the Defendant Currency is subject to forfeiture within ninety days after a
5 claim has been filed in the administrative forfeiture proceedings, unless the Court
6 extends the deadline for good cause shown or by agreement of the parties. That
7 deadline was November 24, 2014.

8 4. By Stipulation and Order filed on November 21, 2014, the parties
9 stipulated to extend to February 23, 2015, the time in which to file a Complaint for
10 Forfeiture and/or to Obtain an Indictment Alleging Forfeiture.

11 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
12 extend to May 22, 2015, the time in which the United States is required to file a civil
13 complaint for forfeiture against the Defendant Currency and/or to obtain an indictment
14 alleging that the Defendant Currency vehicle is subject to forfeiture.

15 6. Accordingly, the parties agree that the deadline by which the United
16 States shall be required to file a complaint for forfeiture against the Defendant
17 Currency and/or to obtain an indictment alleging that the Defendant Currency is

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1 subject to forfeiture shall be extended to May 22, 2015.

2 Date: 2/19/15

BENJAMIN B. WAGNER
United States Attorney

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4 /s/ Jeffrey A. Spivak
JEFFREY A. SPIVAK
5 Assistant U.S. Attorney

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7 Date: 2/19/15

/s/ Angel Mata
ANGEL MATA
8 Attorney for Claimant
9 Dady Lu Thongthipvoravong

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11 **SO ORDERED**
12 **Dated: February 19, 2015**

/s/ Lawrence J. O'Neill
13 **United States District Judge**