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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,) 2:11-MC-00013-FCD-EFB
13 v.)
14 APPROXIMATELY \$33,022.63 SEIZED) STIPULATION AND ORDER EXTENDING
15 FROM WELLS FARGO BUSINESS) TIME FOR FILING A COMPLAINT FOR
16 MANAGEMENT ACCOUNT NUMBER) FORFEITURE AND/OR TO OBTAIN AN
17 008-727-1870, IN THE NAME OF) INDICTMENT ALLEGING FORFEITURE
18 QUICK N' STOP MART, and)
19 2004 BMW M3, VIN:)
20 WBSBR93424PK06914, LICENSE)
NUMBER: 6LAC318,)
Defendants.)

20)

21 It is hereby stipulated by and between the United States of
22 America and claimants Sukhwinder Singh and Charan Dhillon
23 ("claimants"), by and through their respective attorneys, as
24 follows:

25 1. On or about November 23, 2010, claimant Sukhwinder Singh
26 filed a claim, in the administrative forfeiture proceedings, with
27 the U.S. Secret Service with respect to the 2004 BMW M3, VIN:
28

1 WBSBR93424PK06914, License Number 6LAC318 (the "defendant
2 vehicle"), which was seized on or about September 2, 2010. On or
3 about November 24, 2010, claimants Sukhwinder Singh and Charan
4 Dhillon filed claims, in the administrative forfeiture proceedings,
5 with the U.S. Secret Service with respect to the Approximately
6 \$33,022.63 seized from Wells Fargo Business Management Account
7 Number 008-727-1870, in the name of Quick N' Stop Mart, (the
8 "defendant funds"), which were seized on or about October 14, 2010.

9 2. The U.S. Secret Service has sent the written notice of
10 intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known
11 interested parties. The time has expired for any person to file a
12 claim to the defendant vehicle and the defendant funds under 18
13 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimants
14 has filed a claim to the defendant vehicle or the defendant funds
15 as required by law in the administrative forfeiture proceeding.

16 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is
17 required to file a complaint for forfeiture against the defendant
18 vehicle and the defendant funds and/or to obtain an indictment
19 alleging that the defendant vehicle and the defendant funds are
20 subject to forfeiture within 90 days after a claim has been filed
21 in the administrative forfeiture proceedings, unless the court
22 extends the deadline for good cause shown or by agreement of the
23 parties. That deadline is currently February 21, 2011.

24 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
25 by agreement to extend to May 20, 2011, the time in which the
26 United States is required to file a civil complaint for forfeiture
27 against the defendant vehicle and the defendant funds and/or to
28 obtain an indictment alleging that the defendant vehicle and the

1 defendant funds are subject to forfeiture.

2 5. Accordingly, the parties agree that the deadline by which
3 the United States shall be required to file a complaint for
4 forfeiture against the defendant vehicle and the defendant funds
5 and/or to obtain an indictment alleging that the defendant vehicle
6 and the defendant funds are subject to forfeiture shall be extended
7 to **May 20, 2011**.

BENJAMIN B. WAGNER
United States Attorney

10 || DATE: 2/3/11

/s/ Jared C. Dolan

JARED C. DOTAN

Assistant U.S. Attorney

13 || DATE: 2/2/11

/s/ Douglas S. Srulowitz

DOUGLAS S. SRULOWITZ

Attorney for Sukhwinder Singh

16 || DATE: 2/2/11

/s/ Vittoria M. Bossi

VITTORIA M. BOSSI

Attorney for Charan Dhillon

20 IT IS SO ORDERED.

22 || DATE: February 4 2011


FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE