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8 IN THE UNITED STATES DISTRICT COURT FOR THE  
9 EASTERN DISTRICT OF CALIFORNIA  
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11 UNITED STATES OF AMERICA, ) 2:11-MC-00021-LKK-KJN  
12 )  
Plaintiff, ) STIPULATION AND ORDER EXTENDING  
13 ) TIME FOR FILING A COMPLAINT FOR  
v. ) FORFEITURE AND/OR TO OBTAIN AN  
14 ) INDICTMENT ALLEGING FORFEITURE  
APPROXIMATELY \$400,720.00 IN )  
15 U.S. CURRENCY, )  
16 APPROXIMATELY \$294,967.00 IN )  
U.S. CURRENCY, )  
17 APPROXIMATELY \$3,073.00 IN )  
18 U.S. CURRENCY, )  
19 APPROXIMATELY \$399,940.00 IN )  
U.S. CURRENCY, )  
20 APPROXIMATELY \$200,000.00 IN )  
21 U.S. CURRENCY, )  
22 Defendants. )

23 It is hereby stipulated by and between the United States of America and  
24 claimant Lonnie Patrick Terrell ("claimant"), by and through their respective attorney,  
25 as follows:

26 1. On or about December 22, 2010, claimant Lonnie Patrick Terrell filed claims,  
27 in the administrative forfeiture proceedings, with the Drug Enforcement  
28 Administration with respect to the five assets listed in the above-caption (hereafter the

1 "defendant currency"), which were seized October 27, 2010.

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

7 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a  
8 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
9 alleging that the defendant currency is subject to forfeiture within 90 days after a  
10 claim has been filed in the administrative forfeiture proceedings, unless the court  
11 extends the deadline for good cause shown or by agreement of the parties. That  
12 deadline was March 22, 2011.

13 4. By Stipulation and Order filed March 3, 2011, the parties stipulated to  
14 extend to June 20, 2011, the time in which the United States is required to file a civil  
15 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
16 alleging that the defendant currency is subject to forfeiture.

17 5. By Stipulation and Order filed June 1, 2011, the parties stipulated to extend  
18 to September 19, 2011, the time in which the United States is required to file a civil  
19 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
20 alleging that the defendant currency is subject to forfeiture.

21 6. By Stipulation and Order filed September 19, 2011, the parties stipulated to  
22 extend to December 16, 2011, the time in which the United States is required to file a  
23 civil complaint for forfeiture against the defendant currency and/or to obtain an  
24 indictment alleging that the defendant currency is subject to forfeiture.

25 7. By Stipulation and Order filed December 5, 2011, the parties stipulated to  
26 extend to March 15, 2012, the time in which the United States is required to file a civil  
27 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
28 alleging that the defendant currency is subject to forfeiture.

1           8. By Stipulation and Order filed March 9, 2012, the parties stipulated to  
2 extend to June 13, 2012, the time in which the United States is required to file a civil  
3 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
4 alleging that the defendant currency is subject to forfeiture.

5           9. By Stipulation and Order filed May 17, 2012, the parties stipulated to extend  
6 to September 11, 2012, the time in which the United States is required to file a civil  
7 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
8 alleging that the defendant currency is subject to forfeiture.

9           10. By Stipulation and Order filed August 24, 2012, the parties stipulated to  
10 extend to December 10, 2012, the time in which the United States is required to file a  
11 civil complaint for forfeiture against the defendant currency and/or to obtain an  
12 indictment alleging that the defendant currency is subject to forfeiture.

13           11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to  
14 further extend to March 11, 2013, the time in which the United States is required to  
15 file a civil complaint for forfeiture against the defendant currency and/or to obtain an  
16 indictment alleging that the defendant currency is subject to forfeiture.

17           12. Accordingly, the parties agree that the deadline by which the United States  
18 shall be required to file a complaint for forfeiture against the defendant currency

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1 and/or to obtain an indictment alleging that the defendant currency is subject to  
2 forfeiture shall be extended to March 11, 2013.

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BENJAMIN B. WAGNER  
United States Attorney

DATE: 11/19/12


By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

DATE: 11/19/12

/s/ Zenia K. Gilg  
ZENIA K. GILG  
Attorney for Claimant Lonnie  
Patrick Terrell  
(Authorized by email)

**IT IS SO ORDERED.**

DATED: November 20, 2012.

  
LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT