

1 BENJAMIN B. WAGNER
 United States Attorney
 2 KELLI L. TAYLOR
 Assistant U.S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700

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IN THE UNITED STATES DISTRICT COURT FOR THE
 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
)	TIME FOR FILING A COMPLAINT FOR
13	v.)	FORFEITURE AND/OR TO OBTAIN AN
)	INDICTMENT ALLEGING FORFEITURE
14	APPROXIMATELY \$400,720.00 IN)	
	U.S. CURRENCY,)	
15)	
16	APPROXIMATELY \$294,967.00 IN)	
	U.S. CURRENCY,)	
17)	
18	APPROXIMATELY \$3,073.00 IN)	
	U.S. CURRENCY,)	
19)	
20	APPROXIMATELY \$399,940.00 IN)	
	U.S. CURRENCY,)	
21)	
	APPROXIMATELY \$200,000.00 IN)	
	U.S. CURRENCY,)	
21)	
	Defendants.)	

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

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

1 assets listed in the above-caption (hereafter the "defendant
2 currency"), which were seized October 27, 2010.

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

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

17 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
18 by agreement to extend to June 20, 2011, the time in which the
19 United States is required to file a civil complaint for forfeiture
20 against the defendant currency and/or to obtain an indictment
21 alleging that the defendant currency is subject to forfeiture.

22 5. Accordingly, the parties agree that the deadline by which
23 the United States shall be required to file a complaint for
24 forfeiture against the defendant currency and/or to obtain an

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1 indictment alleging that the defendant currency is subject to
2 forfeiture shall be extended to June 20, 2011.

3 BENJAMIN B. WAGNER
4 United States Attorney

5 DATE: 2/28/11

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


8 DATE: 2-24-11

/s/ Zenia K. Gilg
9 ZENIA K. GILG
10 Attorney for Claimant Lonnie
11 Patrick Terrell

(Original signature retained by
12 attorney)

13 **IT IS SO ORDERED.**

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15 DATED: March 3, 2011.

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19 LAWRENCE K. KARLTON
20 SENIOR JUDGE
21 UNITED STATES DISTRICT COURT
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