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

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| UNITED STATES OF AMERICA, |) | 2:11-MC-00021-LKK-KJN |
| |) | |
| Plaintiff, |) | STIPULATION AND ORDER EXTENDING |
| |) | TIME FOR FILING A COMPLAINT FOR |
| v. |) | FORFEITURE AND/OR TO OBTAIN AN |
| |) | INDICTMENT ALLEGING FORFEITURE |
| APPROXIMATELY \$400,720.00 IN |) | |
| U.S. CURRENCY, |) | |
| |) | |
| APPROXIMATELY \$294,967.00 IN |) | |
| U.S. CURRENCY, |) | |
| |) | |
| APPROXIMATELY \$3,073.00 IN |) | |
| U.S. CURRENCY, |) | |
| |) | |
| APPROXIMATELY \$399,940.00 IN |) | |
| U.S. CURRENCY, |) | |
| |) | |
| APPROXIMATELY \$200,000.00 IN |) | |
| U.S. CURRENCY, |) | |
| |) | |
| Defendants. |) | |

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 was March 22, 2011.

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

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

27 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
28 by agreement to further extend to December 16, 2011, the time in

1 which the United States is required to file a civil complaint for
2 forfeiture against the defendant currency and/or to obtain an
3 indictment alleging that the defendant currency is subject to
4 forfeiture.

5 7. Accordingly, the parties agree that the deadline by which
6 the United States shall be required to file a complaint for
7 forfeiture against the defendant currency and/or to obtain an
8 indictment alleging that the defendant currency is subject to
9 forfeiture shall be extended to December 16, 2011.

10 BENJAMIN B. WAGNER
11 United States Attorney

12 DATE: 9/8/11 /s/ Kevin C. Khasigian
13 KEVIN C. KHASIGIAN
14 Assistant U.S. Attorney

15 DATE: 9-8-11 /s/ Zenia K. Gilg
16 ZENIA K. GILG
17 Attorney for Claimant Lonnie
18 Patrick Terrell
19 (Signature retained by attorney)

20 **IT IS SO ORDERED.**

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22 DATED: September 19, 2011.

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26 LAWRENCE K. KARLTON
27 SENIOR JUDGE
28 UNITED STATES DISTRICT COURT