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

10  
 11 UNITED STATES OF AMERICA,

2:11-MC-00030-JAM

12 Plaintiff,

13 v.

STIPULATION AND ORDER  
 EXTENDING TIME FOR FILING  
 A COMPLAINT FOR FORFEITURE  
 AND/OR TO OBTAIN AN  
 INDICTMENT ALLEGING  
 FORFEITURE

14 APPROXIMATELY \$49,360.00 IN U.S.  
 CURRENCY,

15 APPROXIMATELY \$9,166.84 IN U.S.  
 16 CURRENCY,

17 APPROXIMATELY \$4,795.00 IN U.S.  
 CURRENCY,

18 ASSORTMENT OF JEWELRY VALUED AT  
 19 APPROXIMATELY \$6,100.00,

20 2006 MASERATI QUATTROPORTE,  
 VIN: ZAMCE39A660021662, LICENSE  
 21 NUMBER 5SSH877, and

22 2004 DODGE STRATUS,  
 VIN: 1B3EL36X94N192290, LICENSE  
 23 NUMBER 5ZAT819,

24 Defendants.  
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26 It is hereby stipulated by and between the United States of America and claimants David  
 27 Timothy Eugene Brown and Anne Therese Oropeza ("claimants"), by and through their respective  
 28

1 attorneys, as follows:

2 1. On or about December 21, 2010, claimants filed a claim, in the administrative forfeiture  
3 proceedings, with the Federal Bureau of Investigation with respect to the six assets listed in the above  
4 caption (hereafter the "defendant assets"), which were seized on or about September 21 and 22, 2010.

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

10 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
11 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
12 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
13 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
14 That deadline was March 21, 2011.

15 4. By Stipulation and Order filed March 22, 2011, the parties stipulated to extend to June  
16 21, 2011 the time in which the United States is required to file a civil complaint for forfeiture against  
17 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
18 forfeiture.

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

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

27 7. By Stipulation and Order filed December 22, 2011, the parties stipulated to extend to  
28 March 21, 2012 the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
2 to forfeiture.

3 8. By Stipulation and Order filed March 22, 2012, the parties stipulated to extend to June  
4 21, 2012 the time in which the United States is required to file a civil complaint for forfeiture against  
5 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
6 forfeiture.

7 9. By Stipulation and Order filed June 13, 2012, the parties stipulated to extend to  
8 September 21, 2012 the time in which the United States is required to file a civil complaint for  
9 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
10 are subject to forfeiture.

11 10. By Stipulation and Order filed September 13, 2012, the parties stipulated to extend to  
12 December 21, 2012 the time in which the United States is required to file a civil complaint for  
13 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
14 are subject to forfeiture.

15 11. By Stipulation and Order filed December 19, 2012, the parties stipulated to extend to  
16 March 21, 2013 the time in which the United States is required to file a civil complaint for forfeiture  
17 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
18 to forfeiture.

19 12. By Stipulation and Order filed March 15, 2013, the parties stipulated to extend to June  
20 21, 2013 the time in which the United States is required to file a civil complaint for forfeiture against  
21 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
22 forfeiture.

23 13. By Stipulation and Order filed June 21, 2013, the parties stipulated to extend to  
24 September 20, 2013 the time in which the United States is required to file a civil complaint for  
25 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
26 are subject to forfeiture.

27 14. By Stipulation and Order filed September 19, 2013, the parties stipulated to extend to  
28 December 19, 2013 the time in which the United States is required to file a civil complaint for

1 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
2 are subject to forfeiture.

3 15. By Stipulation and Order filed December 19, 2013, the parties stipulated to extend to  
4 March 19, 2014 the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
6 to forfeiture.

7 16. By Stipulation and Order filed March 20, 2014, the parties stipulated to extend to June  
8 17, 2014 the time in which the United States is required to file a civil complaint for forfeiture against  
9 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
10 forfeiture.

11 17. By Stipulation and Order filed June 17, 2014, the parties stipulated to extend to  
12 September 15, 2014 the time in which the United States is required to file a civil complaint for  
13 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
14 are subject to forfeiture.

15 18. By Stipulation and Order filed September 10, 2014, the parties stipulated to extend to  
16 December 15, 2014 the time in which the United States is required to file a civil complaint for  
17 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
18 are subject to forfeiture.

19 19. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
20 extend to March 16, 2015 the time in which the United States is required to file a civil complaint for  
21 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
22 are subject to forfeiture.

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