

1 BENJAMIN B. WAGNER
 United States Attorney
 2 KEVIN C. KHASIGIAN
 Assistant U.S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700
 5 Attorneys for United States

6
 7

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

10

11 UNITED STATES OF AMERICA,)	2:11-MC-00030-FCD
)	
12 Plaintiff,)	
)	
13 v.)	
)	STIPULATION AND ORDER EXTENDING
14 APPROXIMATELY \$49,360.00 IN U.S.)	TIME FOR FILING A COMPLAINT FOR
CURRENCY,)	FORFEITURE AND/OR TO OBTAIN AN
)	INDICTMENT ALLEGING FORFEITURE
15 APPROXIMATELY \$9,166.84 IN U.S.)	
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.)	
)	

25

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

1 as follows:

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

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

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

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

27 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
28 by agreement to further extend to September 21, 2011, the time in

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

5 6. 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 assets and/or to obtain an
8 indictment alleging that the defendant assets are subject to
9 forfeiture shall be extended to September 21, 2011.

10 BENJAMIN B. WAGNER
11 United States Attorney

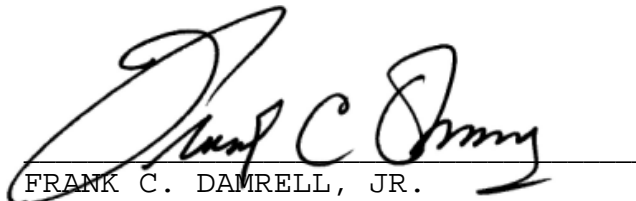
12
13 DATE: 6/16/11 /s/ Kevin C. Khasigian
14 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

15
16
17 DATE: 6/15/11 /s/ Benjamin D. Galloway
18 BENJAMIN D. GALLOWAY
Attorney for Claimant
19 David Timothy Eugene Brown

20
21 DATE: 6/15/11 /s/ Anne Therese Oropeza
22 ANNE THERESE OROPEZA
Claimant

23
24 **IT IS SO ORDERED.**

25
26 DATED: June 16, 2011

27 
FRANK C. DAMRELL, JR.
28 UNITED STATES DISTRICT JUDGE