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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA
 10

11 UNITED STATES OF AMERICA,	}	2:12-MC-00013-GEB-GGH
	}	
12 Plaintiff,	}	STIPULATION AND ORDER
	}	EXTENDING TIME FOR FILING
13 v.	}	A COMPLAINT FOR FORFEITURE
	}	AND/OR TO OBTAIN AN INDICTMENT
	}	ALLEGING FORFEITURE
14 APPROXIMATELY \$35,000.00 in	}	
15 U.S. CURRENCY,	}	
	}	
16 Defendant.	}	

17 It is hereby stipulated by and between the United States of America and
 18 Claimant Edwin Movagharian ("Claimant"), by and through his respective attorney,
 19 as follows:

20 1. On or about November 29, 2011, Claimant filed a claim, in the administrative
 21 forfeiture proceedings, with the Drug Enforcement Administration with respect to the
 22 Approximately \$35,000.00 in U.S. Currency (hereafter the "defendant currency"),
 23 which was seized on September 2, 2011.

24 2. The Drug Enforcement Administration has sent the written notice of intent
 25 to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time
 26 has expired for any person to file a claim to the defendant currency under 18 U.S.C. §
 27 983(a)(2)(A)-(E), and no person other than Claimant have filed a claim to the defendant
 28

1 currency as required by law in the administrative forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a
3 complaint for forfeiture against the defendant currency and/or to obtain an indictment
4 alleging that the defendant currency is subject to forfeiture within ninety days after
5 a claim has been filed in the administrative forfeiture proceedings, unless the court
6 extends the deadline for good cause shown or by agreement of the parties. That
7 deadline is currently February 27, 2012.

8 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
9 extend to April 12, 2012, the time in which the United States is required to file a civil
10 complaint for forfeiture against the defendant currency and/or to obtain an indictment
11 alleging that the defendant currency is subject to forfeiture.

12 5. Accordingly, the parties agree that the deadline by which the United States
13 shall be required to file a complaint for forfeiture against the defendant currency
14 and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture shall be extended to April 12, 2012.

16
17 BENJAMIN B. WAGNER
United States Attorney

18 DATE: 2/24/12

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

20
21 DATE: 2/24/12

22 /s/ Janet Sherman
JANET SHERMAN
Attorney for Claimant Edward Movagharian
(Authorized by email)

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24 **IT IS SO ORDERED.**

25 Dated: February 27, 2012

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27 
GARLAND E. BURRELL, JR.
United States District Judge

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