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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
14 APPROXIMATELY \$35,000.00 in	}	ALLEGING FORFEITURE
15 U.S. CURRENCY,	}	
	}	
16 Defendant.	}	

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

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

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

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

9 4. By Stipulation and Order filed February 28, 2012, the parties stipulated to
10 extend to April 12, 2012, the time in which the United States is required to file a civil
11 complaint for forfeiture against the defendant currency and/or to obtain an indictment
12 alleging that the defendant currency is subject to forfeiture.

13 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
14 further extend to May 14, 2012, the time in which the United States is required to file
15 a civil complaint for forfeiture against the defendant currency and/or to obtain an
16 indictment alleging that the defendant currency is subject to forfeiture.

17 6. Accordingly, the parties agree that the deadline by which the United States
18 shall be required to file a complaint for forfeiture against the defendant currency

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1 and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture shall be extended to May 14, 2012.

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BENJAMIN B. WAGNER
United States Attorney

DATE: 4/12/2012

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

DATE: 4/12/2012

/s/ Janet Sherman
JANET SHERMAN
Attorney for Claimant Edwin Movagharian

(Authorized by email)

IT IS SO ORDERED.

Dated: April 12, 2012



GARLAND E. BURRELL, JR.
United States District Judge