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

10  
11 UNITED STATES OF AMERICA,

2:12-MC-00058-LKK-DAD

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 \$143,058.81 IN U.S.  
CURRENCY SEIZED FROM WELLS  
15 FARGO BANK PERSONAL CHECKING  
ACCOUNT NUMBER 2065307502, AND

16 APPROXIMATELY \$173,450.00 IN U.S.  
17 CURRENCY SEIZED FROM JP  
MORGAN CHASE PERSONAL  
18 CHECKING ACCOUNT NUMBER  
918200346,

19 Defendants.  
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21 It is hereby stipulated by and between the United States of America and  
22 claimant Jeffrey S. Walker ("claimant"), by and through their respective counsel, as  
23 follows:

24 1. On or about May 7, 2012, claimant Jeffrey S. Walker filed a claim, in the  
25 administrative forfeiture proceedings, with the Internal Revenue Service with respect  
26 to the Approximately \$143,058.81 in U.S. Currency seized from Wells Fargo Bank  
27 Personal Checking Account Number 2065307502 and Approximately \$173,450.00 in  
28

1 U.S. Currency seized from JP Morgan Chase Personal Checking Account Number  
2 918200346 (hereafter the "defendant funds"), which were seized on March 6, 2012.

3 2. The Internal Revenue Service has sent the written notice of intent to  
4 forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time  
5 has expired for any person to file a claim to the defendant funds under 18 U.S.C. §  
6 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the  
7 defendant funds as required by law in the administrative forfeiture proceeding.

8 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a  
9 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
10 alleging that the defendant funds are subject to forfeiture within ninety days after a  
11 claim has been filed in the administrative forfeiture proceedings, unless the court  
12 extends the deadline for good cause shown or by agreement of the parties. The  
13 deadline is currently August 6, 2012.

14 4. By Stipulation and Order filed July 30, 2012, the parties stipulated to  
15 extend to November 6, 2012, the time in which the United States is required to file a  
16 civil complaint for forfeiture against the defendant funds and/or to obtain an  
17 indictment alleging that the defendant funds are subject to forfeiture.

18 5. By Stipulation and Order filed November 1, 2012, the parties stipulated to  
19 extend to February 6, 2013, the time in which the United States is required to file a  
20 civil complaint for forfeiture against the defendant funds and/or to obtain an  
21 indictment alleging that the defendant funds are subject to forfeiture.

22 6. By Stipulation and Order filed February 6, 2013, the parties stipulated to  
23 extend to May 6, 2013, the time in which the United States is required to file a civil  
24 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
25 alleging that the defendant funds are subject to forfeiture.

26 7. By Stipulation and Order filed May 9, 2013, the parties stipulated to  
27 extend to August 6, 2013, the time in which the United States is required to file a civil  
28 complaint for forfeiture against the defendant funds and/or to obtain an indictment

1 alleging that the defendant funds are subject to forfeiture.

2 8. By Stipulation and Order filed August 22, 2013, the parties stipulated to  
3 extend to November 6, 2013, the time in which the United States is required to file a  
4 civil complaint for forfeiture against the defendant funds and/or to obtain an  
5 indictment alleging that the defendant funds are subject to forfeiture.

6 9. By Stipulation and Order filed November 5, 2013, the parties stipulated to  
7 extend to February 4, 2014, the time in which the United States is required to file a  
8 civil complaint for forfeiture against the defendant funds and/or to obtain an  
9 indictment alleging that the defendant funds are subject to forfeiture.

10 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to  
11 extend to March 21, 2014, the time in which the United States is required to file a civil  
12 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
13 alleging that the defendant funds are subject to forfeiture.

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