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

10
 11 UNITED STATES OF AMERICA,
 12 Plaintiff,

2:12-mc-00058-LKK-DAD

13 APPROXIMATELY \$143,058.81 IN U.S.
 14 CURRENCY SEIZED FROM WELLS
 FARGO BANK PERSONAL CHECKING
 15 ACCOUNT NUMBER 2065307502, AND
 16 APPROXIMATELY \$173,450.00 IN U.S.
 17 CURRENCY SEIZED FROM JP MORGAN
 CHASE PERSONAL CHECKING
 18 ACCOUNT NUMBER 918200346,
 19 Defendants.

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

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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 U.S. Currency seized from JP Morgan Chase Personal Checking Account Number

1 918200346 (hereafter the "defendant funds"), which were seized on March 6, 2012.

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

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

13 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to
14 extend to November 6, 2012, the time in which the United States is required to file a
15 civil complaint for forfeiture against the defendant funds and/or to obtain an
16 indictment alleging that the defendant funds are subject to forfeiture.

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1 5. Accordingly, the parties agree that the deadline by which the United States
2 shall be required to file a complaint for forfeiture against the defendant funds
3 and/or to obtain an indictment alleging that the defendant funds are subject to
4 forfeiture shall be extended to November 6, 2012.

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6 BENJAMIN B. WAGNER
United States Attorney

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8 DATE: 7/26/12

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

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10 DATE: 7/26/12

/s/ J. Patrick McCarthy
J. PATRICK MCCARTHY
Attorney for Claimant
Jeffrey S. Walker

13 (Original signature retained by attorney)

14 **IT IS SO ORDERED.**

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16 DATE: July 30, 2012.

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LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT