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

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UNITED STATES OF AMERICA,

2:12-MC-00058-LKK-DAD

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Plaintiff,

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

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

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Defendants.

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

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1. On or about May 7, 2012, claimant Jeffrey S. Walker filed a claim, in the  
administrative forfeiture proceedings, with the Internal Revenue Service with respect  
to the Approximately \$143,058.81 in U.S. Currency seized from Wells Fargo Bank  
Personal Checking Account Number 2065307502 and Approximately \$173,450.00 in  
U.S. Currency seized from JP Morgan Chase Personal Checking Account Number  
918200346 (hereafter the "defendant funds"), which were seized on March 6, 2012.

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

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

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

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

20           6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to  
21 extend to May 6, 2013, the time in which the United States is required to file a civil  
22 complaint for forfeiture against the defendant funds and/or to obtain an indictment  
23 alleging that the defendant funds are subject to forfeiture.

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1 7. 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 May 6, 2013.

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6 BENJAMIN B. WAGNER  
United States Attorney

7 DATE: 2/5/13

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


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10 DATE: 2/5/13

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

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13 (As authorized on 2/5/13)

14 **IT IS SO ORDERED.**

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16 DATE: February 6, 2013.

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20 LAWRENCE K. KARLTON  
21 SENIOR JUDGE  
22 UNITED STATES DISTRICT COURT  
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