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

11 UNITED STATES OF AMERICA,	)	2:12-MC-00095-LKK-EFB
12 Plaintiff,	)	STIPULATION AND ORDER EXTENDING
13 v.	)	TIME FOR FILING A COMPLAINT FOR
14 APPROXIMATELY \$4,400.00 IN	)	FORFEITURE AND/OR TO OBTAIN AN
15 U.S. CURRENCY,	)	INDICTMENT ALLEGING FORFEITURE
16 Defendant.	)	
17 _____	)	

18 It is hereby stipulated by and between the United States of America and  
 19 claimant Barbara Antonucci ("claimant"), by and through their respective attorneys, as  
 20 follows:

21 1. On or about August 22, 2012, claimant Barbara Antonucci filed a claim, in  
 22 the administrative forfeiture proceedings, with the Internal Revenue Service -  
 23 Criminal Investigation with respect to the Approximately \$4,400.00 in U.S. Currency  
 24 (hereafter the "defendant currency"), which was seized on or about June 27, 2012.

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

1 to the defendant currency as required by law in the administrative forfeiture  
2 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 90 days after a  
6 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 November 20, 2012.

9 4. By Stipulation and Order filed December 14, 2012, the parties stipulated to  
10 extend to December 20, 2012, the time in which the United States is required to file a  
11 civil complaint for forfeiture against the defendant currency and/or to obtain an  
12 indictment 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 January 22, 2013, the time in which the United States is required to  
15 file 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 January 22, 2013.

3 Dated: 12/19/12

BENJAMIN B. WAGNER  
United States Attorney

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

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8 Dated: 12/18/12

/s/ John R. Duree, Jr.  
JOHN R. DUREE, JR.  
Attorney for claimant Barbara Antonucci  
(Authorized by email)

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11 **IT IS SO ORDERED.**

12 Dated: December 19, 2012.

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LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT

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