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5 | Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13

14 APPROXIMATELY \$189,040.00 IN U.S.
CURRENCY,

Defendant.

2:12-MC-00105-MCE-EFB

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

18 It is hereby stipulated by and between the United States of America and claimant Asif
19 Hafeez, in *propria persona* (“claimant”), as follows:

20 1. On or about September 12, 2012, claimant Asif Hafeez filed a claim, in the
21 administrative forfeiture proceedings, with the Drug Enforcement Administration with respect to the
22 Approximately \$189,040.00 in U. S. Currency (hereafter “defendant currency”), which was seized
23 on June 14, 2012.

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

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

6 4. By Stipulation and Order filed December 6, 2012, the parties stipulated to extend to
7 March 7, 2013, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
9 subject to forfeiture.

10 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an
11 extension to April 8, 2013, the time in which the United States is required to file a civil complaint
12 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the
13 defendant currency is subject to forfeiture.

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1 6. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an
3 indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 8,
4 2013.

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6 Dated: 3/6/13

BENJAMIN B. WAGNER
United States Attorney

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

11 Dated: 3/6/13

/s/ Asif Hafeez
ASIF HAFEEZ
Claimant

13 (As authorized per telephone on 3/6/13)

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15 IT IS SO ORDERED.

16 Dated: March 8, 2013

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20 MORRISON C. ENGLAND, JR., CHIEF JUDGE
21 UNITED STATES DISTRICT JUDGE