

1 BENJAMIN B. WAGNER  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700  
5 Attorneys for the United States

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

2:12-MC-00105-MCE-EFB

12 Plaintiff,

13 v.

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

15 Defendant.  
16

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

17  
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.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

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.

5  
6 Dated: 3/6/13

BENJAMIN B. WAGNER  
United States Attorney

7  
8 /s/ Kevin C. Khasigian  
9 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney


10  
11 Dated: 3/6/13

/s/ Asif Hafeez  
12 ASIF HAFEEZ  
Claimant

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

14  
15 IT IS SO ORDERED.

16 Dated: March 8, 2013

17  
18   
19 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
20 UNITED STATES DISTRICT JUDGE  
21  
22  
23  
24  
25  
26  
27  
28