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

10  
11 UNITED STATES OF AMERICA,

2:13-MC-00013-MCE-AC

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$92,777.78 IN U.S.  
CURRENCY SEIZED FROM RIVER  
15 CITY BANK ACCOUNT NUMBER  
0220074437, HELD IN THE NAMES OF  
16 ADAM WOOD AND BREANNA WOOD,

17 Defendant.  
18

19 It is hereby stipulated by and between the United States of America and claimant Adam Wood  
20 (“claimant”), by and through their respective counsel, as follows:

21 1. On or about November 20, 2012, claimant Adam Wood filed a claim, in the  
22 administrative forfeiture proceedings, with the Internal Revenue Service with respect to the  
23 Approximately \$92,777.78 (hereafter “defendant funds”), which were seized on November 5, 2012.

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

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 funds and/or to obtain an indictment alleging that the defendant funds  
3 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
4 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
5 That deadline is February 18, 2013.

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

10          5.       Accordingly, the parties agree that the deadline by which the United States shall be  
11 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
12 alleging that the defendant funds are subject to forfeiture shall be extended to March 20, 2013.

13 Dated: 2/12/13

BENJAMIN B. WAGNER  
United States Attorney

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


18 Dated: 2/11/13

/s/ Patrick K. Hanly  
PATRICK K. HANLY  
Attorney for Claimant Adam Wood

(As authorized via email on 2/11/13)

22           IT IS SO ORDERED.

23 Dated: February 15, 2013

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25 \_\_\_\_\_  
26 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
27 UNITED STATES DISTRICT JUDGE  
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