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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$16,280.00 IN U.S.  
CURRENCY,  
  
Defendant.

2:13-MC-00021-GEB-DAD  
  
STIPULATION AND ORDER  
EXTENDING TIME FOR FILING  
A COMPLAINT FOR  
FORFEITURE AND/OR TO  
OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and claimants Scott T. J. Dorner and Martine A. Dijkstra (“claimants”), by and through their respective counsel, as follows:

1. On or about December 20, 2012, claimants Scott T. J. Dorner and Martine A. Dijkstra filed claims in the administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the Approximately \$16,280.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 22, 2012.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has filed a claim to the defendant currency as required by law in the 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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties. That deadline is March 20, 2012.

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

13 Dated: 3/15/2013

BENJAMIN B. WAGNER  
United States Attorney

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


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18  
19 Dated: 3/14/2013

/s/ Michael J. Shambrook  
MICHAEL J. SHAMBROOK  
Attorney for claimants  
Scott T. J. Dorner and  
Martine A. Dijkstra

(Signature authorized by telephone)

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21  
22 **IT IS SO ORDERED.**

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25 Dated: 3/15/13

  
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UNITED STATES DISTRICT JUDGE