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

10
 11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$16,280.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

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

17
 18 It is hereby stipulated by and between the United States of America and claimants Scott T. J.
 19 Dorner and Martine A. Dijkstra (“claimants”), by and through their respective counsel, as follows:

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

24 2. The Federal Bureau of Investigation 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 other
 27 than claimants has filed a claim to the defendant currency as required by law in the administrative
 28 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 was originally March 20, 2013.

6 4. By Stipulation and Order filed March 15, 2013, the parties stipulated 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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
11 to August 19, 2013, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

14 6. Accordingly, the parties agree that the deadline by which the United States shall be
15 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
16 alleging that the defendant currency is subject to forfeiture shall be extended to August 19, 2013.

17 Dated: 6/11/2013

BENJAMIN B. WAGNER
United States Attorney

19 /s/ Jeffrey A. Spivak
JEFFREY A. SPIVAK
Assistant U.S. Attorney

21 Dated: 6/11/2013

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

(Signature authorized by email)

26 **IT IS SO ORDERED.**

27 Dated: 6/14/13



28 UNITED STATES DISTRICT JUDGE