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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 \$67,900.00 IN U.S.
 CURRENCY, and
 15 APPROXIMATELY \$3,722.00 IN U.S.
 16 CURRENCY,
 17 Defendants.

2:13-MC-00039-MCE-DAD
 STIPULATION AND ORDER
 EXTENDING TIME FOR FILING
 A COMPLAINT FOR
 FORFEITURE AND/OR TO
 OBTAIN AN INDICTMENT
 ALLEGING FORFEITURE

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

21 1. On or about January 14, 2013, claimant Alejandro Yovani Lopez filed a claim in the
 22 administrative forfeiture proceedings, with the Drug Enforcement Administration with respect to the
 23 Approximately \$67,900.00 in U.S. Currency and Approximately \$3,722.00 in U.S. Currency (hereafter
 24 “defendant currency”), which was seized on October 1, 2012.

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

1 forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
3 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
4 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
5 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
6 parties. That deadline is April 12, 2013.

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

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

14 Dated: 4/11/2013

BENJAMIN B. WAGNER
United States Attorney

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


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21 Dated: 4/11/2013

/s/Lawrence T. Niermeyer
LAWRENCE T. NIERMEYER
Attorney for Claimant
Alejandro Yovani Lopez

(Signature approved by telephone)

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25 **IT IS SO ORDERED**

26 DATED: April 19, 2013

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MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT