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

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11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 1964 CHEVROLET IMPALA, VIN:
 41847J156295, LICENSE NUMBER:
 15 5XDA830, and
 16 APPROXIMATELY \$20,940.00 IN U.S.
 CURRENCY,
 17 Defendants.

2:13-MC-00040-WBS-CKD

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

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20 It is hereby stipulated by and between the United States of America and claimants Roger S.
 21 Segura, Jaime Sturgis, and Monique Sturgis (“claimants”), by and through their respective counsel,
 22 as follows:

23 1. On or about January 15, 2013, claimant Roger S. Segura filed a claim in the
 24 administrative forfeiture proceedings with the Federal Bureau of Investigation (“FBI”) with respect
 25 to the 1964 Chevrolet Impala, VIN: 41847J156295, License Number: 5XDA830 (hereafter
 26 “defendant vehicle”), which was seized on November 8, 2012. On or about January 30, 2013,
 27 claimants Jaime Sturgis and Monique Sturgis filed a claim in the administrative forfeiture
 28 proceedings with the FBI with respect to the Approximately \$20,940.00 in U.S. Currency (hereafter

1 “defendant currency”), which was seized on November 8, 2012.

2 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. §
3 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to
4 the defendant vehicle and defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person
5 other than the claimants has filed a claim to the defendant vehicle and defendant currency as
6 required by law in the administrative forfeiture proceeding.

7 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
8 forfeiture against the defendant vehicle and defendant currency and/or to obtain an indictment
9 alleging that the defendant vehicle and defendant currency are subject to forfeiture within ninety
10 days after a claim has been filed in the administrative forfeiture proceedings, unless the court
11 extends the deadline for good cause shown or by agreement of the parties. That deadline is April 15,
12 2013 for the defendant vehicle and April 30, 2013 for the defendant currency.

13 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
14 June 28, 2013, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant vehicle and defendant currency and/or to obtain an indictment alleging that the
16 defendant vehicle and defendant currency are subject to forfeiture.

17 5. Accordingly, the parties agree that the deadline by which the United States shall be
18 required to file a complaint for forfeiture against the defendant vehicle and defendant currency
19 and/or to obtain an indictment alleging that the defendant vehicle and defendant currency are subject
20 to forfeiture shall be extended to June 28, 2013.

21 Dated: 4/12/13

BENJAMIN B. WAGNER
United States Attorney

22
23 By: /s/ Kevin C. Khasigian
24 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

25
26 Dated: 4/10/13

/s/ Julius M. Engel
JULIUS M. ENGEL
Attorney for claimant Roger S. Segura

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Dated: 4/10/13

/s/ Philip Cozens
PHILIP COZENS
Attorney for claimants Jaime Sturgis
and Monique Sturgis

(Signatures authorized by phone)

IT IS SO ORDERED.

Dated: April 17, 2013


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE