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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 \$27,353.00 IN U.S.
CURRENCY,
15 Defendant.
16

2:13-MC-00064-TLN-KJN

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

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

20 1. On or about April 4, 2013, claimant Alen Alesevic filed a claim in the administrative
21 forfeiture proceeding with the U.S. Drug Enforcement Administration with respect to the Approximately
22 \$27,353.00 in U.S. Currency (hereafter “defendant currency”), which was seized on February 12, 2013.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
26 than claimant has filed a claim to the defendant currency as required by law in the administrative
27 forfeiture proceeding.
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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 July 3, 2013.

6 4. By Stipulation and Order filed July 2, 2013, the parties stipulated to extend to August 2,
7 2013, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed July 31, 2013, the parties stipulated to extend to August
11 23, 2013, the time in which the United States is required to file a civil complaint for forfeiture against
12 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
13 forfeiture.

14 6. By Stipulation and Order filed August 22, 2013, the parties stipulated to extend to
15 September 23, 2013, the time in which the United States is required to file a civil complaint for
16 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
17 currency is subject to forfeiture.

18 7. By Stipulation and Order filed September 19, 2013, the parties stipulated to extend to
19 November 22, 2013, the time in which the United States is required to file a civil complaint for
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
21 currency is subject to forfeiture.

22 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
23 to December 17, 2013, the time in which the United States is required to file a civil complaint for
24 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
25 currency is subject to forfeiture.

26 9. Accordingly, the parties agree that the deadline by which the United States shall be

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1 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
2 alleging that the defendant currency is subject to forfeiture shall be extended to December 17, 2013.

3 Dated: 11/20/13

BENJAMIN B. WAGNER
United States Attorney

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

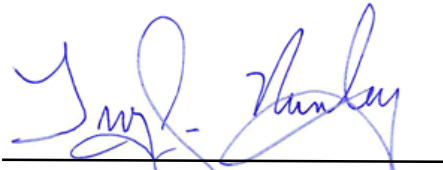
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8 Dated: 11/19/13

/s/ Justin L. Ward
JUSTIN L. WARD
Attorney for claimant
Alen Alesevic

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11 (Authorized by phone)

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13 **IT IS SO ORDERED.**

14 Dated: November 20, 2013

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Troy L. Nunley
United States District Judge