

1 BENJAMIN B. WAGNER  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States

6  
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

17  
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.  
28

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.       By Stipulation and Order filed November 21, 2013, the parties stipulated to extend to  
23 December 17, 2013, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
25 subject to forfeiture.

26          9.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
27 to January 16, 2014, the time in which the United States is required to file a civil complaint for forfeiture  
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is

1 subject to forfeiture.

2 10. Accordingly, the parties agree that the deadline by which the United States shall be  
3 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
4 alleging that the defendant currency is subject to forfeiture shall be extended to January 16, 2014.

5 Dated: 12/13/13

BENJAMIN B. WAGNER  
United States Attorney

6  
7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

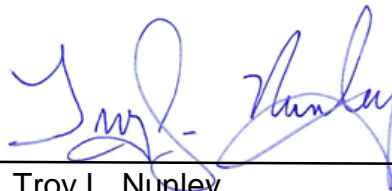
9  
10 Dated: 12/13/13

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

(Authorized by phone)

11  
12  
13  
14  
15 **IT IS SO ORDERED.**

16 Dated: December 16, 2013

17  
18  
19  
20  
21   
Troy L. Nunley  
United States District Judge