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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$27,353.00 IN U.S.
CURRENCY,

Defendant.

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

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

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

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

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
4 parties. That deadline was July 3, 2013.

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

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

13 6. By Stipulation and Order filed August 21, 2013, the parties stipulated to extend to
14 September 23, 2013, the time in which the United States is required to file a civil complaint for
15 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
16 currency is subject to forfeiture.

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

21 8. 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 November 22, 2013.

3 Dated: 9/18/13

BENJAMIN B. WAGNER
United States Attorney

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

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9 Dated: 9/17/13

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

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(Signature authorized by email)

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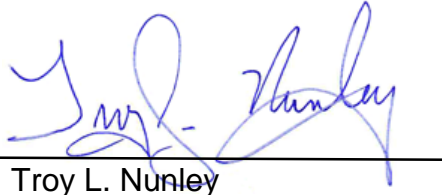
IT IS SO ORDERED.

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Dated: September 18, 2013

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Troy L. Nunley
United States District Judge

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