

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 \$97,980.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:13-MC-00083-JAM-DAD

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 Joshua
 19 Bowen Furlong (“claimant”), by and through their respective counsel, as follows:

20 1. On or about May 20, 2013, claimant Joshua Bowen Furlong filed a claim in the
 21 administrative forfeiture proceedings with the Drug Enforcement Administration (“DEA”) with
 22 respect to the Approximately \$97,980.00 in U.S. Currency (hereafter “defendant currency”), which
 23 was seized on January 10, 2013.

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

1 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 proceedings, unless the court extends the deadline for good cause shown or by agreement
6 of the parties. That deadline is currently August 16, 2013.

7 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
8 October 15, 2013, the time in which the United States is required to file a civil complaint for
9 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
10 currency is subject to 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
13 indictment alleging that the defendant currency is subject to forfeiture shall be extended to
14 October 15, 2013.

15 Dated: 8/7/13

BENJAMIN B. WAGNER
United States Attorney

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

19
20 Dated: 8/6/13

/s/ John Balazs
JOHN BALAZS
Attorney for claimant Joshua Bowen Furlong

(Authorized by email)

23
24 **IT IS SO ORDERED.**

25 Dated: 8/9/2013

/s/ John A. Mendez
UNITED STATES DISTRICT COURT JUDGE