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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 \$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

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 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 was August 16, 2013.

7 4. By Stipulation and Order filed August 9, 2013, the parties stipulated 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. By Stipulation and Order filed October 11, 2013, the parties stipulated to extend to  
12 November 14, 2013, the time in which the United States is required to file a civil complaint for  
13 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
14 currency is subject to forfeiture.

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

19 7. Accordingly, the parties agree that the deadline by which the United States shall be  
20 required to file a complaint for forfeiture against the defendant currency and/or to obtain an

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1 indictment alleging that the defendant currency is subject to forfeiture shall be extended to  
2 December 13, 2013.

3 Dated: 11/13/13

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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8 Dated: 11/13/13

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

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(Authorized by phone)

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**IT IS SO ORDERED.**

13 Dated: 11/13/2013

/s/ John A. Mendez  
JOHN A. MENDEZ  
United States District Court Judge

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