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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

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 11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$97,980.00 IN U.S.
 CURRENCY,
 15 Defendant.
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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 Bowen
 19 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 respect to
 22 the Approximately \$97,980.00 in U.S. Currency (hereafter “defendant currency”), which was seized on
 23 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 the
 26 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a
 27 claim to the defendant currency as required by law in the administrative 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 proceedings, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was August 16, 2013.

6 4. By Stipulation and Order filed August 9, 2013, the parties stipulated to extend to October
7 15, 2013, the time in which the United States is required to file a civil complaint for forfeiture against
8 the 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 October 11, 2013, the parties stipulated to extend to
11 November 14, 2013, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

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

18 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
19 to January 13, 2014, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
21 subject to forfeiture.

22 8. Accordingly, the parties agree that the deadline by which the United States shall be
23 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 January 13, 2014.

3 Dated: 12/12/13

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: 12/12/13

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

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(Authorized by email)

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IT IS SO ORDERED

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14 Dated: 12/13/2013

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

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