1	HEATHER E. WILLIAMS, #122664 Federal Defender TIMOTHY ZINDEL, #158377 Assistant Federal Defender 801 I Street, 3 rd Floor Sacramento, CA 95814 Tel: 916-498-5700/Fax 916-498-5710 timothy zindel@fd.org
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6	Attorney for Claimant
7	ASHLEY CHANG
8	IN THE UNITED STATES DISTRICT COURT
9	FOR THE EASTERN DISTRICT OF CALIFORNIA
10	UNITED STATES OF AMERICA, Case No. 2:14-CV-02941-GEB-DAD
11	Plaintiff,
12	VS. STIPULATION AND ORDER APPOINTING
13	REAL PROPERTY LOCATED AT 7520 MUIRFIELD WAY,
14	SACRAMENTO, CALIFORNIA, SACRAMENTO COUNTY, APN:
15	048-0270-043-0000, INCLUDING ALL APPURTENANCES
16	AND IMPROVEMENTS THERETO,
17	REAL PROPERTY LOCATED AT 7455 WILLOWICK WAY,
18	SACRAMENTO, CALIFORNIA, SACRAMENTO COUNTY, APN:
19	047-0265-009-0000, INCLUDING ALL APPURTENANCES
20	AND IMPROVEMENTS THERETO,
21	REAL PROPERTY LOCATED AT 2381 KENWORTHY WAY,
22	SACRAMENTO, CALIFORNIA, SACRAMENTO COUNTY, APN:
23	053-0021-010-0000, INCLUDING ALL APPURTENANCES
24	AND IMPROVEMENTS THERETO,
25	and
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REAL PROPERTY LOCATED AT 1 1724 S STREET, SACRAMENTO, 2 CALIFORNIA, SACRAMENTO COUNTY, APN: 009-0096-008-3 0000, INCLUDING ALL APPURTENANCES AND 4 IMPROVEMENTS THERETO. Defendants. 5 6 7 IT IS HEREBY STIPULATED AND AGREED between plaintiff, 8 9 United States of America, and claimant Ashley Chang as follows: 10 1. On November 19, 2014, the Magistrate Judge appointed 11 the Office of the Federal Defender to represent Ashley Chang in 12 United States v. Ma et al., 2:14-CR-0330-GEB, to which this 13 civil forfeiture case has been ordered related. Ms. Chang 14 submitted a financial affidavit demonstrating that she is 15 presently indigent and therefore financially unable to obtain 16 17 representation by counsel. 18 2. On December 18, 2014, the United States filed a 19 verified complaint for forfeiture in rem against the properties 20 listed above. 21 3. Section 983(b)(1)(A) of Title 18, United States Code, 22 provides: 23 If a person with standing to contest the forfeiture of 24 property in a civil judicial forfeiture proceeding under a civil forfeiture statute is financially unable 25 to obtain representation by counsel, and the person is represented by counsel appointed under section 3006A 26 of this title in connection with a related criminal case, the court may authorize counsel to represent 27 that person with respect to the claim. 28

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4. Ms. Chang has filed a verified claim to the properties. 1 2 Pursuant to 18 U.S.C. § 983(b)(1)(A), she Chang asks the Court to authorize the Federal Defender to represent her in the above 3 forfeiture case. 4 5. The United States agrees that the Federal Defender may 5 be appointed to represent Ms. Chang in this matter. 6 7 Respectfully submitted, 8 HEATHER E. WILLIAMS 9 Federal Defender 10 Dated: January 21, 2015 /s/ T. Zindel 11 TIMOTHY ZINDEL Assistant Federal Defender 12 Attorney for ASHLEY CHANG 13 BENJAMIN B. WAGNER 14 United States Attorney 15 Dated: January 21, 2015 /s/ T. Zindel for K. Khasigian 16 KEVIN KHASIGIAN Assistant U.S. Attorney 17 18 ORDER 19 20 Pursuant to 18 U.S.C. § 983(b)(1)(A), the Office of the 21 Federal Defender is hereby authorized to represent Ashley Chang 22 in the above case. 23 IT IS SO ORDERED. 24 Dated: January 22, 2015 25 26 27 GARLAND E. BURRELL, JR. 28 Senior United States District Judge