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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 \$104,340.00 IN
U.S. CURRENCY,

Defendant.

2:14-MC-00007-MCE-EFB

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 potential claimant Brian Keith Hall (“claimant”), by and through their respective counsel, as follows:

1. On or about October 21, 2013, claimant Brian Keith Hall filed a claim in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the Approximately \$104,340.00 in U.S. Currency (hereafter “defendant currency”), which was seized on or about July 22, 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

1 forfeiture 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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the
6 parties. That deadline is January 17, 2014.

7 4. By Stipulation and Order filed January 24, 2014, the parties stipulated to extend to April
8 17, 2014, the time in which the United States is required to file a civil complaint for forfeiture against
9 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 5. By Stipulation and Order filed April 16, 2014, the parties stipulated to extend to June 16,
12 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
16 to August 15, 2014, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
18 subject to forfeiture.

19 7. 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 August 15, 2014.

3 Dated: 6/6/14

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: 6/6/14

/s/ Angie Palmerin
ANGIE PALMERIN
Attorney for claimant Brian Keith Hall

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(Authorized by email)


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13 **IT IS SO ORDERED.**

14 Dated: June 24, 2014

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MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT

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