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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 \$5,000.00 IN U.S.  
CURRENCY, and

15 APPROXIMATELY \$1,216.00 IN U.S.  
16 CURRENCY,

17 Defendants  
18

2:14-MC-00008-LKK-KJN

STIPULATION AND ORDER  
EXTENDING TIME FOR FILING  
A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING  
FORFEITURE

19 It is hereby stipulated by and between the United States of America and claimants  
20 Lee Vang and Chai Chang (“claimants”), in *Pro Se*, as follows:

21 1. On or about October 18, 2013, claimants Lee Vang and Chai Chang filed  
22 claims, in the administrative forfeiture proceedings, with the Internal Revenue Service  
23 with respect to the Approximately \$5,000.00 in U.S. Currency and Approximately  
24 \$1,216.00 in U.S. Currency (hereafter “defendant currency”), which was seized on August  
25 28, 2013.

26 2. The Internal Revenue Service has sent the written notice of intent to forfeit  
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has  
28

1 expired for any person to file a claim to the defendant currency under 18 U.S.C. §  
2 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant  
3 currency as required by law in the administrative forfeiture proceeding.

4         3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a  
5 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
6 alleging that the defendant currency is subject to forfeiture within ninety days after a  
7 claim has been filed in the administrative forfeiture proceedings, unless the court extends  
8 the deadline for good cause shown or by agreement of the parties. That deadline is  
9 January 16, 2014.

10         4. By Stipulation and Order filed January 23, 2014, the parties stipulated to  
11 extend to April 16, 2014, the time in which the United States is required to file a civil  
12 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
13 alleging that the defendant currency is subject to forfeiture.

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

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1           6.       Accordingly, the parties agree that the deadline by which the United States  
2 shall be required to file a complaint for forfeiture against the defendant currency and/or  
3 to obtain an indictment alleging that the defendant currency is subject to forfeiture shall  
4 be extended to June 16, 2014.

5 Dated:     4/10/14

BENJAMIN B. WAGNER  
United States Attorney

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7           /s/ Jeffrey A. Spivak  
JEFFREY A. SPIVAK  
Assistant U.S. Attorney

9 Dated:     4/10/14

10           /s/ Lee Vang  
LEE VANG  
Claimant, in PRO SE


12 Dated:     4/10/14

13           /s/ Chai Chang  
CHAI CHANG  
Claimant, in PRO SE

14   (Signatures retained by attorney)

15  
16 IT IS SO ORDERED.

17 Dated: April 11, 2014.

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21   LAWRENCE K. KARLTON  
22   SENIOR JUDGE  
23   UNITED STATES DISTRICT COURT