

1 BENJAMIN B. WAGNER  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States

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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 \$142,020.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

2:14-MC-00025-WBS-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 Newton Mancía  
19 (“claimant”), by and through their respective counsel, as follows:

20 1. On or about November 19, 2013, claimant Newton Mancía filed a claim in the  
21 administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the  
22 Approximately \$142,020.00 in U.S. Currency (hereafter “defendant currency”), which was seized on or  
23 about October 12, 2012.

24 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
25 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
26 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
27 than claimant has filed a claim to the defendant currency as required by law in the administrative  
28

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 was February 17, 2014.

7 4. By Stipulation and Order filed February 12, 2014, the parties stipulated to extend to April  
8 3, 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 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 2, 2014, the parties stipulated to extend to May 5,  
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. By Stipulation and Order filed May 2, 2014, the parties stipulated to extend to May 30,  
16 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
18 forfeiture.

19 7. By Stipulation and Order filed May 30, 2014, the parties stipulated to extend to June 30,  
20 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
22 forfeiture.

23 8. By Stipulation and Order filed June 30, 2014, the parties stipulated to extend to July 30,  
24 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
26 forfeiture.

27 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
28 to August 29, 2014, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
2 subject to forfeiture.

3 10. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
5 alleging that the defendant currency is subject to forfeiture shall be extended to August 29, 2014.

6 Dated: 7/29/14

BENJAMIN B. WAGNER  
United States Attorney


7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

9  
10 Dated: 7/28/14

/s/ Stuart Goldfarb  
STUART GOLDFARB  
Attorney for claimant Newton Mancia  
(Authorized by email)

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13 **IT IS SO ORDERED.**

14 Dated: July 30, 2014

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16 WILLIAM B. SHUBB  
17 UNITED STATES DISTRICT JUDGE  
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