

BENJAMIN B. WAGNER  
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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 \$142,020.00 IN  
U.S. CURRENCY,

Defendant.

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

It is hereby stipulated by and between the United States of America and claimant Newton Mancia (“claimant”), by and through their respective counsel, as follows:

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

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 February 17, 2014.

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

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

14 Dated: 2/11/14

BENJAMIN B. WAGNER  
United States Attorney

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


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19  
20 Dated: 2/10/14

/s/ Stuart Goldfarb  
STUART GOLDFARB  
Attorney for claimant Newton Mancina

(Authorized by email)

21  
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23 **IT IS SO ORDERED.**

24 Dated: February 11, 2014

25   
26 WILLIAM B. SHUBB  
27 UNITED STATES DISTRICT JUDGE  
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