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

15 6. Accordingly, the parties agree that the deadline by which the United States shall be
16 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
17 alleging that the defendant currency is subject to forfeiture shall be extended to May 5, 2014.

18 Dated: 4/1/14

BENJAMIN B. WAGNER
United States Attorney


19
20 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

21
22 Dated: 4/1/14

/s/ Stuart Goldfarb
STUART GOLDFARB
Attorney for claimant Newton Mancina
(Authorized by phone)

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25 **IT IS SO ORDERED.**

26 Dated: April 1, 2014

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WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE