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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 \$14,600.00 IN U.S.  
 CURRENCY, and  
 15 APPROXIMATELY \$5,900.00 IN U.S.  
 16 CURRENCY,  
 17 Defendants.

2:14-MC-00048-TLN-AC

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

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 19 It is hereby stipulated by and between the United States of America and claimant Felipe S.  
 20 Gonzalez (“claimant”), by and through their respective counsel, as follows:

21 1. On or about January 9, 2014, claimant Felipe S. Gonzalez filed a claim, in the  
 22 administrative forfeiture proceedings, with the Drug Enforcement Administration with respect to the  
 23 Approximately \$14,600.00 in U.S. Currency and Approximately \$5,900.00 in U.S. Currency  
 24 (collectively “defendant currency”), which was seized on August 7, 2013.

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

1 administrative 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 proceedings, unless the court extends the deadline for good cause shown or by agreement  
6 of the parties. The deadline was April 9, 2014.

7 4. By Stipulation and Order filed April 9, 2014, the parties stipulated to extend to July 8,  
8 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  
10 to forfeiture.

11 5. By Stipulation and Order filed July 3, 2014, the parties stipulated to extend to  
12 October 6, 2014, the time in which the United States is required to file a civil complaint for  
13 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
14 currency is subject to forfeiture.

15 6. By Stipulation and Order filed October 3, 2014, the parties stipulated to extend to  
16 December 5, 2014, the time in which the United States is required to file a civil complaint for  
17 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
18 currency is subject to forfeiture.

19 7. By Stipulation and Order filed December 3, 2014, the parties stipulated to extend to  
20 March 5, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
22 subject to forfeiture.

23 8. By Stipulation and Order filed March 12, 2015, the parties stipulated to extend to  
24 June 5, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
25 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
26 subject to forfeiture.

27 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an  
28 extension to September 3, 2015, the time in which the United States is required to file a civil

1 complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
2 the defendant currency is 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  
5 indictment alleging that the defendant currency is subject to forfeiture shall be extended to  
6 September 3, 2015.

7 Dated: 6/2/2015

BENJAMIN B. WAGNER  
United States Attorney

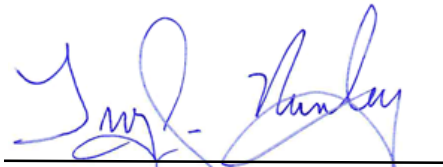
9 By: /s/ Kevin C. Khasigian  
10 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

11  
12 Dated: 6/2/2015

/s/ Mark J. Reichel  
13 MARK J. REICHEL  
Attorney for claimant  
14 Felipe S. Gonzalez  
(Authorized via email 6/2/15)

15  
16 IT IS SO ORDERED.

17 Dated: June 2, 2015

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Troy L. Nunley  
United States District Judge