

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

6
 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

18
 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. By Stipulation and Order filed June 3, 2015, the parties stipulated to extend to
28 September 3, 2015, the time in which the United States is required to file a civil complaint for

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

3 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an
4 extension to December 2, 2015, the time in which the United States is required to file a civil
5 complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
6 the defendant currency is subject to forfeiture

7 11. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an
9 indictment alleging that the defendant currency is subject to forfeiture shall be extended to
10 December 2, 2015.

11 Dated: 9/2/2015

BENJAMIN B. WAGNER
United States Attorney

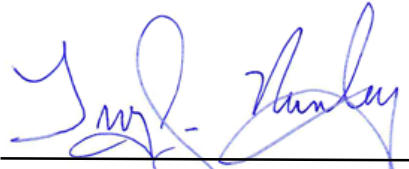
12
13 By: /s/ Kevin C. Khasigian
14 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

15
16 Dated: 9/2/2015

/s/ Mark J. Reichel
17 MARK J. REICHEL
Attorney for claimant
18 Felipe S. Gonzalez
(Authorized via email 9/2/15)

19
20 IT IS SO ORDERED.

21 Dated: September 3, 2015

22
23 
24 Troy L. Nunley
United States District Judge