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6  
 7  
 8 IN THE UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

10  
 11 UNITED STATES OF AMERICA,

2:14-MC-00048-TLN-AC

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$14,600.00 IN U.S.  
 CURRENCY, and

15 APPROXIMATELY \$5,900.00 IN U.S.  
 16 CURRENCY,

17 Defendants.

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. By Stipulation and Order filed September 4, 2015, the parties stipulated to extend to  
4 December 2, 2015, the time in which the United States is required to file a civil complaint for  
5 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
6 currency is subject to forfeiture.

7 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an  
8 extension to January 1, 2016, the time in which the United States is required to file a civil complaint  
9 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the  
10 defendant currency is subject to forfeiture

11 12. 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  
13 indictment alleging that the defendant currency is subject to forfeiture shall be extended to January  
14 1, 2016.

15 Dated: 11/30/2015

BENJAMIN B. WAGNER  
United States Attorney

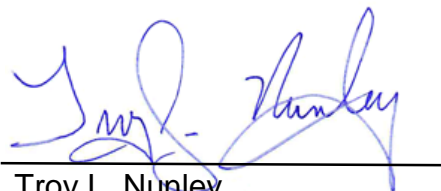
17  
18 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

19  
20 Dated: 11/30/2015

/s/ Mark J. Reichel  
MARK J. REICHEL  
Attorney for claimant  
Felipe S. Gonzalez  
(Authorized via email 11/30/15)

21  
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23  
24 IT IS SO ORDERED.

25 Dated: December 1, 2015

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27   
Troy L. Nunley  
United States District Judge