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

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 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-LKK-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  
 20 claimant Felipe S. Gonzalez (“claimant”), by and through their respective counsel, as  
 21 follows:

22 1. On or about January 9, 2014, claimant Felipe S. Gonzalez filed a claim, in  
 23 the administrative forfeiture proceedings, with the Drug Enforcement Administration  
 24 with respect to the Approximately \$14,600.00 in U.S. Currency and Approximately  
 25 \$5,900.00 in U.S. Currency (collectively “defendant currency”), which was seized on  
 26 August 7, 2013.

27 2. The Drug Enforcement Administration has sent the written notice of  
 28 intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties.

1 The time has expired for any person to file a claim to the defendant currency under 18  
2 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the  
3 defendant currency as required by law in the administrative forfeiture proceeding.

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a  
5 complaint for forfeiture against the defendant currency and/or to obtain an indictment  
6 alleging that the defendant currency is subject to forfeiture within ninety days after a  
7 claim has been filed in the administrative forfeiture proceedings, unless the court  
8 extends the deadline for good cause shown or by agreement of the parties. The  
9 deadline is April 9, 2014.

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

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1           5.       Accordingly, the parties agree that the deadline by which the United  
2 States shall be required to file a complaint for forfeiture against the defendant  
3 currency and/or to obtain an indictment alleging that the defendant currency is subject  
4 to forfeiture shall be extended to July 8, 2014.

5 Dated: 4/8/2014

BENJAMIN B. WAGNER  
United States Attorney

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


9  
10 Dated: 4/8/2014

/s/ Mark J. Reichel  
MARK J. REICHEL  
Attorney for claimant  
Felipe S. Gonzalez

(As authorized via phone)

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14 IT IS SO ORDERED.

15 Dated: April 9, 2014.

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LAWRENCE K. KARLTON  
20 SENIOR JUDGE  
21 UNITED STATES DISTRICT COURT  
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