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

10
11 UNITED STATES OF AMERICA,

2:14-MC-00048-LKK-AC

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.

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 was April 9, 2014.

10 4. By Stipulation and Order filed April 9, 2014, the parties stipulated to
11 extend to July 8, 2014, the time in which the United States is required to file a civil
12 complaint for forfeiture against the defendant currency and/or to obtain an indictment
13 alleging that the defendant currency is subject to forfeiture.

14 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for
15 an extension to October 6, 2014, the time in which the United States is required to file
16 a civil complaint for forfeiture against the defendant currency and/or to obtain an
17 indictment alleging that the defendant currency is subject to forfeiture.

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1 6. 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 October 6, 2014.

5 Dated: 7/2/2014

BENJAMIN B. WAGNER
United States Attorney

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


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10 Dated: 7/2/2014

/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: July 3, 2014.

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LAWRENCE K. KARLTON
21 SENIOR JUDGE
UNITED STATES DISTRICT COURT
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