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

11 UNITED STATES OF AMERICA,  
 12 Plaintiff,  
 13 v.  
 14 APPROXIMATELY \$41,500.00 IN U.S.  
 CURRENCY,  
 15 Defendant

2:14-MC-00060-MCE-DAD

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

17 It is hereby stipulated by and between the United States of America and claimant Luis Rosario  
 18 (“claimant”), by and through their respective counsel, as follows:

19 1. On or about January 24, 2014, claimant Luis Rosario filed a claim, in the administrative  
 20 forfeiture proceedings, with the Drug Enforcement Administration with respect to the Approximately  
 21 \$41,500.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 30, 2013.

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

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
 28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
3 the parties. That deadline was April 24, 2014.

4 4. By Stipulation and Order filed April 29, 2014, the parties stipulated to extend to June 23,  
5 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
9 extend to August 22, 2014, the time in which the United States is required to file a civil complaint for  
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
11 currency is subject to forfeiture.

12 6. Accordingly, the parties agree that the deadline by which the United States shall be  
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
14 alleging that the defendant currency is subject to forfeiture shall be extended to August 22, 2014.

15 Dated: 6/11/14

BENJAMIN B. WAGNER  
United States Attorney

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


19 Dated: 6/11/14

/s/ Edward E. Moukawsher  
EDWARD E. MOUKAWSHER  
Attorney for Claimant Luis Rosario

Authorized via phone

22 IT IS SO ORDERED.

23 Dated: September 3, 2014

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25   
26 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
27 UNITED STATES DISTRICT COURT  
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