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 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 \$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

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 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. By Stipulation and Order filed June 25, 2014, the parties stipulated to extend to August
9 22, 2014, the time in which the United States is required to file a civil complaint for forfeiture against
10 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. By Stipulation and Order filed September 9, 2014, the parties stipulated to extend to
13 October 21, 2014, the time in which the United States is required to file a civil complaint for forfeiture
14 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
15 subject to forfeiture.

16 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
17 extend to November 20, 2014, the time in which the United States is required to file a civil complaint
18 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
19 currency is subject to forfeiture.

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1 7. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to November 20, 2014.

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5 Dated: 10/16/14

BENJAMIN B. WAGNER
United States Attorney

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

10 Dated: 10/16/14

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

14 (Authorized via telephone)

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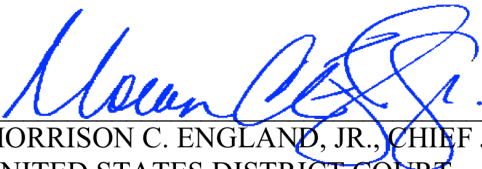
1 **ORDER**

2 Pursuant to the parties' October 16, 2014, Stipulation (ECF No. 8), the deadline by
3 which the United States shall be required to file a complaint for forfeiture against the
4 defendant currency and/or to obtain an indictment alleging that the defendant currency is
5 subject to forfeiture IS EXTENDED to November 20, 2014.

6 The four joint stipulations submitted in this case reflect that Edward E.
7 Moukawsher is counsel for Claimant Luis Rosario. See ECF Nos. 1, 3, 5, 8. Edward E.
8 Moukawsher is not admitted to practice in the Eastern District of California and should
9 not represent any party in this court until he applies for and is admitted before the
10 Eastern District of California. See Local Rule 180. Prior to the filing of a fifth (or any
11 additional) stipulations on behalf of Claimant Luis Rosario, Edward E. Moukawsher is
12 ORDERED to comply with the Court's Local Rules. Plaintiff United States of America is
13 ORDERED to serve a copy of this Order on Edward E. Moukawsher.¹

14 IT IS SO ORDERED.

15 Dated: October 29, 2014

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17 MORRISON C. ENGLAND, JR., CHIEF JUDGE
18 UNITED STATES DISTRICT COURT

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27 ¹ In the event that Plaintiff United States seeks a further extension of time for filing a complaint for forfeiture
28 and/or to obtain an indictment alleging forfeiture and counsel for Claimant Luis Rosario is not yet admitted to practice
before the Eastern District of California, Plaintiff may submit an ex parte request in lieu of a fifth joint stipulation. Within
the ex parte application, Plaintiff may indicate whether Claimant Luis Rosario opposes the further extension of time.