

1 BENJAMIN B. WAGNER  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700  
5 Attorneys for the United States

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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 \$28,500.00 IN U.S.  
CURRENCY,  
15 Defendant.  
16

2:14-MC-00067-GEB-EFB

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

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18 It is hereby stipulated by and between the United States of America and claimants Hector  
19 Rodriguez, Sr. and Zoila Rodriguez, through undersigned counsel, as follows:

20 1. On or about February 5, 2014, claimants Hector Rodriguez, Sr. and Zoila Rodriguez  
21 filed a claim, in the administrative forfeiture proceedings, with the Drug Enforcement Administration  
22 with respect to the Approximately \$28,500.00 in U.S. Currency (hereafter “defendant currency”),  
23 which was seized between November 26, 2013.

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

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

6           4.       By Stipulation and Order filed May 2, 2014, the parties stipulated to extend to July 7,  
7 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10          5.       By Stipulation and Order filed July 3, 2014, the parties stipulated to extend to September  
11 5, 2014, the time in which the United States is required to file a civil complaint for forfeiture against  
12 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
13 forfeiture.

14          6.       By Stipulation and Order filed August 29, 2014, the parties stipulated to extend to  
15 November 4, 2014, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
17 subject to forfeiture.

18          7.       By Stipulation and Order filed October 30, 2014, the parties stipulated to extend to  
19 February 4, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
21 subject to forfeiture.

22          8.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
23 extend to April 3, 2015, the time in which the United States is required to file a civil complaint for  
24 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
25 currency is subject to forfeiture.

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1 9. 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 are subject to forfeiture shall be extended to April 3, 2015.

4 Dated: 1/30/15

BENJAMIN B. WAGNER  
United States Attorney

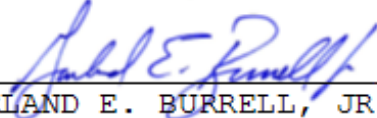
5  
6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

7  
8 Dated: 1/30/15

/s/ Jesse I. Santana  
JESSE I. SANTANA  
Attorney for Claimants  
(Authorized via email 1/30/15)

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12 IT IS SO ORDERED.

13 Dated: January 30, 2015

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16 GARLAND E. BURRELL, JR.  
Senior United States District Judge