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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 claimants 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.       By Stipulation and Order filed February 2, 2015, the parties stipulated to extend to April  
23 3, 2015, the time in which the United States is required to file a civil complaint for forfeiture against  
24 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
25 forfeiture.

26          9.       By Stipulation and Order filed April 2, 2015, the parties stipulated to extend to June 1,  
27 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
28 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to

1 forfeiture.

2 10. By Stipulation and Order filed May 26, 2015, the parties stipulated to extend to August  
3 28, 2015, the time in which the United States is required to file a civil complaint for forfeiture against  
4 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
5 forfeiture.

6 11. By Stipulation and Order filed August 26, 2015, the parties stipulated to extend to  
7 November 25, 2015, the time in which the United States is required to file a civil complaint for  
8 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
9 currency is subject to forfeiture.

10 12. By Stipulation and Order filed November 25, 2015, the parties stipulated to extend to  
11 February 23, 2016, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
13 subject to forfeiture.

14 13. By Stipulation and Order filed February 23, 2016, the parties stipulated to extend to  
15 April 22, 2016, 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 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
19 extend to June 21, 2016, the time in which the United States is required to file a civil complaint for  
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
21 currency is subject to forfeiture.

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1           15.     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 June 21, 2016.

4 Dated: 4/7/16

BENJAMIN B. WAGNER  
United States Attorney

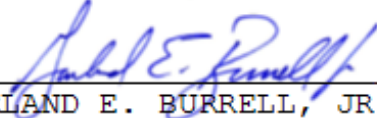
5  
6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

7  
8 Dated: 4/6/16

9  
10 /s/ Jesse I. Santana  
JESSE I. SANTANA  
Attorney for Claimants  
(Authorized by email)

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12           IT IS SO ORDERED.

13 Dated: April 11, 2016

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