

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

6
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

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

14 6. Accordingly, the parties agree that the deadline by which the United States shall be
15 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
16 alleging that the defendant currency are subject to forfeiture shall be extended to September 5, 2014.

17 Dated: 7/2/14

BENJAMIN B. WAGNER
United States Attorney

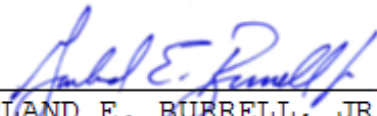
18
19 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

20
21 Dated: 7/2/14

/s/ Jesse I. Santana
JESSE I. SANTANA
Attorney for Claimants
(Authorized via email 7/2/14)

22
23
24 IT IS SO ORDERED.

25 Dated: July 2, 2014

26
27
28 

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