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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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
19 extend to February 4, 2015, 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 8. 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 February 4, 2015.

4 Dated: 10/29/14

BENJAMIN B. WAGNER
United States Attorney

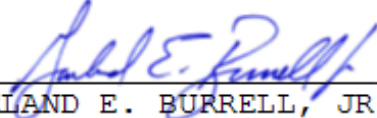
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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

7
8 Dated: 10/29/14

/s/ Jesse I. Santana
JESSE I. SANTANA
Attorney for Claimants
(Authorized via email 10/29/14)

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12 IT IS SO ORDERED.

13 Dated: October 29, 2014

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