

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 \$4,100.00 IN U.S.  
 CURRENCY,  
 15 Defendant.  
 16

2:14-MC-00071-WBS-KJN

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 claimant Rachel Marie  
 19 Regan (“claimant”), by and through their respective counsel, as follows:

20 1. On or about February 4, 2014, claimant filed a claim in the administrative forfeiture  
 21 proceeding with the Drug Enforcement Administration with respect to the Approximately \$4,100.00 in  
 22 U.S. Currency (hereafter “defendant currency”), which was seized on or about October 10, 2013.

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

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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties. That deadline was May 5, 2014.

6           4.       By Stipulation and Order filed May 7, 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 7, 2014, the parties stipulated to extend to October 6,  
11 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
12 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 September 30, 2014, the parties stipulated to extend to  
15 December 5, 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 November 24, 2014, the parties stipulated to extend to  
19 January 20, 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 extend  
23 to April 20, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
25 subject to forfeiture.

26          9.       Accordingly, the parties agree that the deadline by which the United States shall be

27 ///

28 ///

1 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
2 alleging that the defendant currency is subject to forfeiture shall be extended to April 20, 2015.

3 Dated: 1/16/15

BENJAMIN B. WAGNER  
United States Attorney


4  
5 By: /s/ Kevin C. Khasigian  
6 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

7  
8 Dated: 1/16/15

/s/ Kelly Babineau  
KELLY BABINEAU  
Attorney for claimant Rachel Marie Regan  
(Authorized by phone)

9  
10  
11 **IT IS SO ORDERED.**

12 Dated: January 20, 2015

13   
14 WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE