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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 \$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. By Stipulation and Order filed January 21, 2015, the parties stipulated to extend to April
23 20, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
24 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
25 forfeiture.

26 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
27 to July 20, 2015, the time in which the United States is required to file a civil complaint for forfeiture
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is

1 subject to forfeiture.

2 10. Accordingly, the parties agree that the deadline by which the United States shall be
3 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
4 alleging that the defendant currency is subject to forfeiture shall be extended to July 20, 2015.

5 Dated: 4/14/15

BENJAMIN B. WAGNER
United States Attorney


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

10 Dated: 4/10/15

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

13 **IT IS SO ORDERED.**

14 Dated: April 15, 2015

15 
16 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE