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5 Attorneys for the United States

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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 MISCELLANEOUS FIREARMS,
 AMMUNITION, AND CURRENCY
 15 LISTED IN EXHIBIT A,

16 Defendant.

2:14-MC-00074-LKK-CKD

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 potential claimant Mike
 19 R. Turner (“claimant”), as follows:

20 1. On or about February 6, 2014, claimant filed a claim in the administrative forfeiture
 21 proceeding with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) with respect to the
 22 Miscellaneous Firearms and Ammunition listed in Exhibit A¹ attached hereto and incorporated herein
 23 (hereafter “defendant properties”), which were seized on or about October 9, 2013.

24 2. The ATF has sent the written notice of intent to forfeit required by 18 U.S.C. §
 25 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
 26 defendant properties under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a

27 ¹ The United States has resolved the claims of Craig Mason and LaRay Chambers. In addition, the United States has decided
 28 not to file against the two amounts of currency claimed by Mike R. Turner. Exhibit A attached contains only the defendant
 properties that the United States is currently seeking forfeiture of.

1 claim to the defendant properties as required by law in the administrative forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
3 forfeiture against the defendant properties and/or to obtain an indictment alleging that the defendant
4 properties are subject to forfeiture within ninety days after a claim has been filed in the administrative
5 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
6 parties. That deadline was May 7, 2014.

7 4. By Stipulation and Order filed May 14, 2014, the parties stipulated to extend to July 7,
8 2014, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant properties and/or to obtain an indictment alleging that the defendant properties are subject to
10 forfeiture.

11 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
12 to October 6, 2014, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant properties and/or to obtain an indictment alleging that the defendant properties are
14 subject to forfeiture.

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

18 Dated: 6/29/14

BENJAMIN B. WAGNER
United States Attorney


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

21
22 Dated: 6/27/14

/s/ Greg Foster
GREG FOSTER
Attorney for potential claimant Mike R. Turner
(Signature authorized by email)

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25 **IT IS SO ORDERED.**

26 Dated: July 2, 2014.

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LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT

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Exhibit A

1. Unknown Rifle Cal: unknown SN: none (14-ATF-000769),
2. Unknown Rifle Cal: unknown SN: none (14-ATF-000773),
3. Unknown Rifle Cal: unknown SN: none (14-ATF-000774),
4. Unknown Rifle Cal: unknown SN: none (14-ATF-000782),
5. Unknown Rifle Cal: unknown SN: none (14-ATF-000783),
6. Polytechnologies AKS Rifle Cal: 762 SN: 8748 (14-ATF-000786),
7. Unknown Pistol Cal: unknown SN: none (14-ATF-000789),
8. Unknown Pistol Cal: unknown SN: none (14-ATF-000790),
9. Unknown Rifle Cal: unknown SN: none (14-ATF-000791),
10. Unknown Rifle Cal: unknown SN: none (14-ATF-000792),
11. Unknown Rifle Cal: unknown SN: none (14-ATF-000794),
12. Unknown Receiver/Frame Cal: unknown SN: none (14-ATF-000795),
13. Unknown Rifle Cal: unknown SN: none (14-ATF-000796),
14. Vltor Weapons Systems unknown Pistol Cal: unknown SN: none (14-ATF-001254), and
15. 20 rounds of Winchester-Western ammunition Cal: 20 (14-ATF-001054).