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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$19,970.00 IN
 U.S. CURRENCY,
 15 Defendant.
 16

2:14-MC-00075-MCE-KJN

STIPULATION AND ORDER EXTENDING
 TIME FOR FILING A COMPLAINT FOR
 FORFEITURE AND/OR TO OBTAIN AN
 INDICTMENT ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant
 18 Vanessa West (“claimant”), by and through their respective counsel, as follows:

19 1. On or about February 7, 2014, claimant Vanessa West filed a claim in the administrative
 20 forfeiture proceeding with the Drug Enforcement Administration with respect to the Approximately
 21 \$19,970.00 in U.S. Currency (hereafter “defendant currency”), which was seized on or about
 22 December 18, 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 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
4 parties. That deadline was May 8, 2014.

5 4. By Stipulation and Order filed May 7, 2014, the parties stipulated to extend to August 6,
6 2014, the time in which the United States is required to file a civil complaint of forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
8 forfeiture.

9 5. By Stipulation and Order filed August 11, 2014, the parties stipulated to extend to
10 October 3, 2014, the time in which the United States is required to file a civil complaint of forfeiture
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
12 subject to forfeiture.

13 6. By Stipulation and Order filed October 2, 2014, the parties stipulated to extend to
14 December 2, 2014, the time in which the United States is required to file a civil complaint of forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

17 7. By Stipulation and Order filed December 2, 2014, the parties stipulated to extend to
18 January 30, 2015, the time in which the United States is required to file a civil complaint of forfeiture
19 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
20 subject to forfeiture.

21 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
22 to March 2, 2015, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
24 subject to forfeiture.

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1 9. 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 is subject to forfeiture shall be extended to March 2, 2015.

4 Dated: 1/21/15

BENJAMIN B. WAGNER
United States Attorney

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


9 Dated: 1/21/15

10 /s/ Justin T. Mixon
11 JUSTIN T. MIXON
Attorney for claimant Vanessa West

12 (Authorized via e-mail)

13
14 **IT IS SO ORDERED.**

15 Dated: January 27, 2015

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17 
18 MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT