BENJAMIN B. WAGNER 1 **United States Attorney** KEVIN C. KHASIGIAN 2 Assistant U. S. Attorney 501 I Street. Suite 10-100 3 Sacramento, CA 95814 Telephone: (916) 554-2700 4 Attorneys for the United States 5 6 7 8

## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

2:14-MC-00075-MCE-KJN

12 | Plaintiff,

v.

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APPROXIMATELY \$19,970.00 IN U.S. CURRENCY,

Defendant.

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

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

- 1. On or about February 7, 2014, claimant Vanessa West filed a claim in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the Approximately \$19,970.00 in U.S. Currency (hereafter "defendant currency"), which was seized on or about December 18, 2013.
- 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.
  - 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

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

- 4. By Stipulation and Order filed May 7, 2014, the parties stipulated to extend to August 6, 2014, the time in which the United States is required to file a civil complaint of forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 5. By Stipulation and Order filed August 11, 2014, the parties stipulated to extend to October 3, 2014, the time in which the United States is required to file a civil complaint of forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 6. By Stipulation and Order filed October 2, 2014, the parties stipulated to extend to December 2, 2014, the time in which the United States is required to file a civil complaint of forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 7. By Stipulation and Order filed December 2, 2014, the parties stipulated to extend to January 30, 2015, the time in which the United States is required to file a civil complaint of forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 8. By Stipulation and Order filed January 27, 2015, the parties stipulated to extend to March 2, 2015, the time in which the United States is required to file a civil complaint of forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to May 1, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

1	10. 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 indictme	nt
3	alleging that the defendant currency is subject to forfeiture shall be extended to May 1, 2015.	
4	Dated: 2/23/15  BENJAMIN B. WAGNER	
5	United States Attorney	
6	By: /s/ Kevin C. Khasigian	
7	By: /s/ Kevin C. Khasigian KEVIN C. KHASIGIAN Assistant U.S. Attorney	
8	Assistant 0.5. Attorney	
9	Dated: 2/23/15 /s/ Justin T. Mixon	
10	JUSTIN T. MIXON Attorney for claimant Vanessa West	
11	(Authorized via e-mail)	
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14	IT IS SO ORDERED.	
15	Dated: March 3, 2015	
16	Moun / Ex.	
17	MORRISON C. ENGLAND, JR., CHIEF JUDGE UNITED STATES DISTRICT COURT	
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	3 Stipulation and Order to Extend T	ime