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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendant.

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

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

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. By Stipulation and Order filed January 27, 2015, the parties stipulated to extend to March
22 2, 2015, the time in which the United States is required to file a civil complaint of forfeiture against the
23 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
24 forfeiture.

25 9. By Stipulation and Order filed March 4, 2015, the parties stipulated to extend to May 1,
26 2015, the time in which the United States is required to file a civil complaint of forfeiture against the
27 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
28 forfeiture.

1 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
2 to June 30, 2015, the time in which the United States is required to file a civil complaint for forfeiture
3 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
4 subject to forfeiture.

5 11. Accordingly, the parties agree that the deadline by which the United States shall be
6 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
7 alleging that the defendant currency is subject to forfeiture shall be extended to June 30, 2015.

8 Dated: 4/30/15

BENJAMIN B. WAGNER
United States Attorney


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

12
13 Dated: 4/30/15

14 /s/ Justin T. Mixon
JUSTIN T. MIXON
Attorney for claimant Vanessa West
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16 (Authorized via e-mail)

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18 **IT IS SO ORDERED.**

19 Dated: May 8, 2015

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