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10
11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

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

18 Defendant.

19 2:14-MC-00075-MCE-KJN

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

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

26 1. On or about February 7, 2014, claimant Vanessa West filed a claim in the administrative
27 forfeiture proceeding with the Drug Enforcement Administration with respect to the Approximately
28 \$19,970.00 in U.S. Currency (hereafter “defendant currency”), which was seized on or about
December 18, 2013.

29 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
30 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
31 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
32 than claimant has filed a claim to the defendant currency as required by law in the administrative
33 forfeiture proceeding.

34 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

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

13 Dated: 4/30/15

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

18 **IT IS SO ORDERED.**

19 Dated: May 8, 2015

20 
21 MORRISON C. ENGLAND, JR., CHIEF JUDGE
22 UNITED STATES DISTRICT COURT