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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$63,176.00 in U.S.  
Currency,

15 Defendant.  
16

2:14-mc-00087-MCE-EFB

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 Lian  
18 Chao Xiong ("claimant"), by and through his respective counsel, as follows:

19 1. On or about March 18, 2014, claimant filed a claim in the administrative forfeiture  
20 proceeding with the Drug Enforcement Administration with respect to the Approximately \$63,176.00 in  
21 U.S. Currency (hereafter "defendant currency"), which were seized on or about January 15, 2014.

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

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline was June 16, 2014.

4 4. By Stipulation and Order filed June 25, 2014, the parties stipulated to extend to August  
5 15, 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. By Stipulation and Order filed August 15, 2014, the parties stipulated to extend to October  
9 14, 2014, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

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

16 7. By Stipulation and Order filed November 19, 2014, the parties stipulated to extend to  
17 January 12, 2015, the time in which the United States is required to file a civil complaint for forfeiture  
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
19 subject to forfeiture.

20 8. By Stipulation and Order filed January 14, 2015, the parties stipulated to extend to March  
21 13, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
22 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
23 forfeiture.

24 9. By Stipulation and Order filed March 11, 2015, the parties stipulated to extend to April  
25 13, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
26 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
27 forfeiture.

28 10. By Stipulation and Order filed April 16, 2015, the parties stipulated to extend to June 12,

1 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
2 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
3 forfeiture.

4 11. By Stipulation and Order filed June 12, 2015, the parties stipulated to extend to August  
5 11, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 12. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
9 to November 9, 2015, the time in which the United States is required to file a civil complaint for  
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
11 currency is subject to forfeiture.

12 13. Accordingly, the parties agree that the deadline by which the United States shall be  
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
14 alleging that the defendant currency is subject to forfeiture shall be extended to November 9, 2015.

15 Dated: 7/20/15

BENJAMIN B. WAGNER  
United States Attorney

16  
17 By: /s/ Marilee L. Miller  
MARILEE L. MILLER  
Assistant U.S. Attorney


18  
19 Dated: 7/20/15

/s/ Suzan Yee  
SUZAN YEE  
Attorney for claimant  
Lian Chao Xiong

(Authorized by email )

22 IT IS SO ORDERED.

23 Dated: July 28, 2015

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25   
26 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
27 UNITED STATES DISTRICT COURT  
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