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

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 APPROXIMATELY \$63,176.00 in U.S.
17 Currency,

18 Defendant.

19 2:14-MC-00087-MCE-EFB

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 Lian
25 Chao Xiong (“claimant”), by and through his respective counsel, as follows:

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

28 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.

29 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
30 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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
17 to 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.

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1 8. 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 January 12, 2015.

4 Dated: 11/13/14

BENJAMIN B. WAGNER
United States Attorney

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

8 Dated: 11/13/14

/s/ William J. Taylor
WILLIAM J. TAYLOR
Attorney for claimant
Lian Chao Xiong

9 (Authorized by phone)

10 IT IS SO ORDERED.

11 Dated: November 18, 2014

12 
13 MORRISON C. ENGLAND, JR., CHIEF JUDGE
14 UNITED STATES DISTRICT COURT