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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$67,646.00 IN U.S.
CURRENCY,

15 Defendant

2:14-MC-00110-WBS-DAD

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

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17 It is hereby stipulated by and between the United States of America and claimant Cedric Sewell
18 (“claimant”), by and through their respective counsel, as follows:

19 1. On or about June 10, 2014, claimant Cedric Sewell filed a claim, in the administrative
20 forfeiture proceedings, with the Federal Bureau of Investigation with respect to the Approximately
21 \$67,646.00 in U.S. Currency (hereafter “defendant currency”), which was seized on March 5, 2014.

22 2. The Federal Bureau of Investigation 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
25 other than the claimant has filed a claim to the defendant currency as required by law in the
26 administrative 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 proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline was September 8, 2014.

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

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
9 extend to January 6, 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 6. 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 January 6, 2015.

15 Dated: 10/24/14

BENJAMIN B. WAGNER
United States Attorney

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

19 Dated: 10/24/14

/s/ Colin Cooper
COLIN COOPER
Attorney for Claimant Cedric Sewell

(Authorized via email)

23 IT IS SO ORDERED.

24 Dated: October 24, 2014


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE