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6
 7 IN THE UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
 9

10 UNITED STATES OF AMERICA,
 11 Plaintiff,
 12 v.
 13 APPROXIMATELY \$147,260.00 IN U.S.
 14 CURRENCY,
 15 Defendant.

2:14-MC-00133-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
 18 James Pozo, by and through their respective attorneys, as follows:

19 1. On or about August 20, 2014, claimant James Pozo filed a claim, in the
 20 administrative forfeiture proceedings, with the Drug Enforcement Administration (“DEA”) with
 21 respect to the Approximately \$147,260.00 in U.S. Currency (hereafter “defendant currency”), which
 22 was seized on May 6, 2014 and adopted by DEA on June 24, 2014.

23 2. The DEA has sent the written notice of intent to forfeit required by 18 U.S.C. §
 24 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to
 25 the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant
 26 has filed a claim to the defendant currency as required by law in the administrative forfeiture
 27 proceeding.
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1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency are subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement
5 of the parties. That deadline is November 18, 2014.

6 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
7 December 18, 2014, the time in which the United States is required to file a civil complaint for
8 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
9 currency is subject to forfeiture.

10 5. Accordingly, the parties agree that the deadline by which the United States shall be
11 required to file a complaint for forfeiture against the defendant currency and/or to obtain an
12 indictment alleging that the defendant currency is subject to forfeiture shall be extended to
13 December 18, 2014.

14 Dated: 11/3/2014

BENJAMIN B. WAGNER
United States Attorney


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

18
19 Dated: 10/29/2014

/s/ Jacek W. Lentz
JACEK W. LENTZ
Attorney for potential claimant James Pozo
(Authorized via email)

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21
22 **IT IS SO ORDERED.**

23 Dated: November 6, 2014

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