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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 \$30,000.00 IN U.S.
 CURRENCY,
 15 Defendant

2:14-MC-00152-TLN-CKD

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 Juber Flores-
 18 Suarez (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2014, claimant Juber Flores-Suarez filed a claim, in the
 20 administrative forfeiture proceedings, with the Drug Enforcement Administration with respect to the
 21 Approximately \$30,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on
 22 June 9, 2014.

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

28 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 proceedings, unless the court extends the deadline for good cause shown or by agreement of
4 the parties. That deadline is December 26, 2014.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
6 February 24, 2015, the time in which the United States is required to file a civil complaint for forfeiture
7 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
8 subject to forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
11 alleging that the defendant currency is subject to forfeiture shall be extended to February 24, 2015.

12 Dated: 12/12/14

BENJAMIN B. WAGNER
United States Attorney

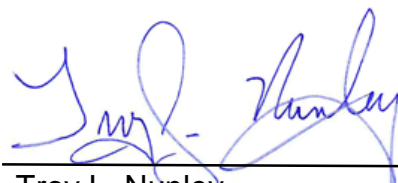
13
14 /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

15
16 Dated: 12/12/14

17 /s/ Brett A. Purtzer
BRET A. PURTZER
Attorney for Claimant Juber Flores-Suarez
18
19 Authorized via phone

20 IT IS SO ORDERED.

21 Dated: December 23, 2014

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23 
24 Troy L. Nunley
United States District Judge
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