

1 PHILLIP A. TALBERT
 United States Attorney
 2 KEVIN C. KHASIGIAN
 Assistant U. S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700
 5 Attorneys for the United States

6
 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

16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

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

It is hereby stipulated by and between the United States of America and claimants Juber Flores-Suarez (“claimants” or “Flores-Suarez”) and Rafael Martinez-Suarez (“claimants” or “Martinez-Suarez”), by and through their respective counsel, as follows:

1. On or about September 29, 2014, claimants Juber Flores-Suarez and Rafael Martinez-Suarez filed claims, in the administrative forfeiture proceedings, with the Drug Enforcement Administration with respect to the Approximately \$30,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on June 9, 2014.

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 the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

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 is 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 of
5 the parties. That deadline was December 26, 2014.

6 4. By Stipulation and Order filed December 24, 2014, the parties stipulated to extend to
7 February 24, 2015, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
9 subject to forfeiture.

10 5. By Stipulation and Order filed February 23, 2015, the parties stipulated to extend to
11 April 25, 2015, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

14 6. By Stipulation and Order filed April 20, 2015, the parties stipulated to extend to June 24,
15 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
17 forfeiture.

18 7. By Stipulation and Order filed June 26, 2015, the parties stipulated to extend to
19 September 22, 2015, the time in which the United States is required to file a civil complaint for
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
21 currency is subject to forfeiture.

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

26 9. By Stipulation and Order filed November 20, 2015, the parties stipulated to extend to
27 January 19, 2016, the time in which the United States is required to file a civil complaint for forfeiture
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is

1 subject to forfeiture.

2 10. By Stipulation and Order filed January 19, 2016, the parties stipulated to extend to
3 March 18, 2016, the time in which the United States is required to file a civil complaint for forfeiture
4 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
5 subject to forfeiture.

6 11. By Stipulation and Order filed March 15, 2016, the parties stipulated to extend to May
7 17, 2016, the time in which the United States is required to file a civil complaint for forfeiture against
8 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 12. By Stipulation and Order filed May 16, 2016, the parties stipulated to extend to June 16,
11 2016, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
13 forfeiture.

14 13. By Stipulation and Order filed July 22, 2016, the parties stipulated to extend to August
15 15, 2016, the time in which the United States is required to file a civil complaint for forfeiture against
16 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
17 forfeiture.

18 14. By Stipulation and Order filed August 12, 2016, the parties stipulated to extend to
19 September 15, 2016, the time in which the United States is required to file a civil complaint for
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
21 currency is subject to forfeiture.

22 15. By Stipulation and Order filed September 9, 2016, the parties stipulated to extend to
23 October 14, 2016, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
25 subject to forfeiture.

26 16. By Stipulation and Order filed October 18, 2016, the parties stipulated to extend to
27 January 12, 2017, the time in which the United States is required to file a civil complaint for forfeiture
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is

1 subject to forfeiture.

2 17. By Stipulation and Order filed January 6, 2017, the parties stipulated to extend to March
3 13, 2017, the time in which the United States is required to file a civil complaint for forfeiture against
4 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
5 forfeiture.

6 18. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
7 extend to June 12, 2017, 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 19. 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 indictment
12 alleging that the defendant currency is subject to forfeiture shall be extended to June 12, 2017.

13 Dated: 3/8/2017

PHILLIP A. TALBERT
United States Attorney

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

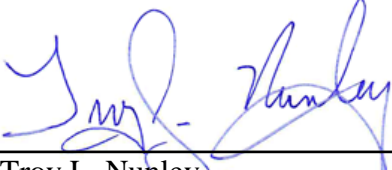
16
17 Dated: 3/8/2017

/s/ Brett A. Purtzer
BRETT A. PURTZER
Attorney for Claimants Juber Flores-Suarez &
Rafael Martinez-Suarez

18
19
20 Authorized via email

21 IT IS SO ORDERED.

22 Dated: 03/08/17

23
24 
25 Troy L. Nunley
United States District Judge