

1 BENJAMIN B. WAGNER  
 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

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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

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

16  
 17 It is hereby stipulated by and between the United States of America and claimants Juber Flores-  
 18 Suarez (“claimants” or “Flores-Suarez”) and Rafael Martinez-Suarez (“claimants” or “Martinez-  
 19 Suarez”), by and through their respective counsel, as follows:

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

24 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
 25 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
 26 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person  
 27 other than the claimant has filed a claim to the defendant currency as required by law in the  
 28 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.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
11 extend to April 25, 2015, the time in which the United States is required to file a civil complaint for  
12 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
13 currency is subject to forfeiture.

14          6.       Accordingly, the parties agree that the deadline by which the United States shall be  
15 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
16 alleging that the defendant currency is subject to forfeiture shall be extended to April 25, 2015.

17 Dated:     2/23/15

BENJAMIN B. WAGNER  
United States Attorney

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

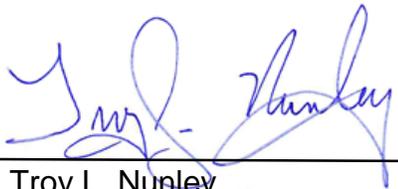
21 Dated:     2/23/15

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

Authorized via email

25 IT IS SO ORDERED.

26 Dated: February 23, 2015

  
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Troy L. Nunley  
United States District Judge