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8 IN THE UNITED STATES DISTRICT COURT

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EASTERN DISTRICT OF CALIFORNIA

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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

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.     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.     As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
19 extend to September 22, 2015, the time in which the United States is required to file a civil complaint  
20 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
21 currency is subject to forfeiture.

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8. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to September 22, 2015.

Dated: 6/22/15

BENJAMIN B. WAGNER  
United States Attorney

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

Dated: 6/22/15

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

Authorized via phone

IT IS SO ORDERED.

Dated: June 25, 2015

Troy L. Nunley