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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

2:14-MC-00153-TLN-EFB

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$65,180.00 IN U.S.  
CURRENCY,

15 Defendant.  
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18 It is hereby stipulated by and between the United States of America and claimant Paul Tuzzolino  
19 (“claimant”), by and through their respective counsel, as follows:

20 1. On or about September 25, 2014, claimant filed a claim in the administrative forfeiture  
21 proceeding with the Drug Enforcement Administration with respect to the Approximately \$65,180.00 in  
22 U.S. Currency (hereafter “defendant currency”), which was seized on or about June 10, 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 other  
26 than claimant has filed a claim to the defendant currency as required by law in the administrative  
27 forfeiture proceeding.  
28

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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties. That deadline is December 24, 2014.

6           4.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
7 January 23, 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.       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 January 23, 2015.

13 Dated: 12/18/14

BENJAMIN B. WAGNER  
United States Attorney

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

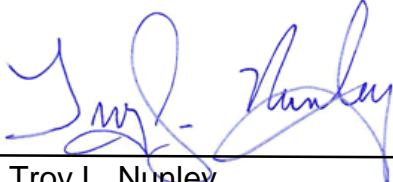
16  
17 Dated: 12/18/14

/s/ Beorn Zepp  
BEORN ZEPP  
Attorney for claimant Paul Tuzzolino

18  
19 (Authorized by email)

20  
21 **IT IS SO ORDERED.**

22 Dated: December 23, 2014

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24   
Troy L. Nunley  
United States District Judge