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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 \$65,180.00 IN U.S.
CURRENCY,
15 Defendant.
16

2:14-MC-00153-TLN-EFB

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 claimant Paul Tuzzolino
18 (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2014, claimant filed a claim in the administrative forfeiture
20 proceeding with the Drug Enforcement Administration with respect to the Approximately \$65,180.00 in
21 U.S. Currency (hereafter “defendant currency”), which was seized on or about June 10, 2014.

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

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was December 24, 2014.

4 4. By Stipulation and Order filed December 24, 2014, the parties stipulated to extend to
5 January 23, 2015, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
7 subject to forfeiture.

8 5. By Stipulation and Order filed January 27, 2015, the parties stipulated to extend to March
9 24, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. By Stipulation and Order filed March 24, 2015, the parties stipulated to extend to April
13 23, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

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

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

4 Dated: 4/16/15

BENJAMIN B. WAGNER
United States Attorney

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

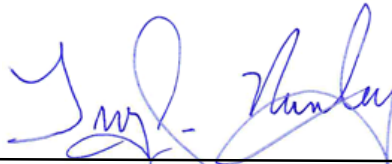
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8 Dated: 4/16/15

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

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10 (Authorized by phone)

11 **IT IS SO ORDERED.**

12 Dated: April 17, 2015

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Troy L. Nunley
United States District Judge