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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 \$19,575.00 IN U.S.
15 CURRENCY,
16 Defendant.

2:15-MC-00004-WBS-AC

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 Daniel Hagel,
18 through undersigned counsel, as follows:

19 1. On or about October 14, 2014, claimant Daniel Hagel filed a claim, in the administrative
20 forfeiture proceedings, with the Drug Enforcement Administration with respect to the defendant
21 currency captioned above (hereafter "defendant currency"), which was seized on July 30, 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
25 other than the claimant has filed a claim to the defendant currency as required by law in the
26 administrative 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 proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline is January 12, 2015.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement for an extension
5 to February 12, 2015, the time in which the United States is required to file a civil complaint for
6 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
7 currency is subject to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to February 12, 2015.

11 Dated: 1/9/2015

BENJAMIN B. WAGNER
United States Attorney


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

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15 Dated: 1/9/2015

/s/ Alan G. Karow
ALAN G. KAROW
Attorney for Claimant Daniel Hagel
(Authorized via email 1/9/15)

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19 IT IS SO ORDERED.

20 Dated: January 12, 2015

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22 WILLIAM B. SHUBB
23 UNITED STATES DISTRICT JUDGE
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