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10  
11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13  
14 UNITED STATES OF AMERICA,  
15 v.  
16 APPROXIMATELY \$19,575.00 IN U.S.  
17 CURRENCY,  
18 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

19 It is hereby stipulated by and between the United States of America and claimant Daniel Hagel,  
20 through undersigned counsel, as follows:

21 1. On or about October 14, 2014, claimant Daniel Hagel filed a claim, in the administrative  
22 forfeiture proceedings, with the Drug Enforcement Administration with respect to the defendant  
23 currency captioned above (hereafter “defendant currency”), which was seized on July 30, 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  
other than the claimant has filed a claim to the defendant currency as required by law in the  
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

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

15 Dated: 1/9/2015

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

18  
19 IT IS SO ORDERED.

20 Dated: January 12, 2015

21   
22 WILLIAM B. SHUBB  
23 UNITED STATES DISTRICT JUDGE  
24  
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