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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 \$305,120.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:15-MC-00023-KJM-CKD

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

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

20 1. On or about December 18, 2014, claimant filed a claim in the administrative forfeiture
 21 proceeding with the Drug Enforcement Administration with respect to the Approximately \$305,120.00 in
 22 U.S. Currency (hereafter “defendant currency”), which was seized on or about July 7, 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 was March 18, 2015.

6 4. By Stipulation and Order filed March 17, 2015, the parties stipulated to extend to May 18,
7 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed May 14, 2015, the parties stipulated to extend to July 17,
11 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
13 forfeiture.

14 6. By Stipulation and Order filed July 13, 2015, the parties stipulated to extend to October
15 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. By Stipulation and Order filed September 28, 2015, the parties stipulated to extend to
19 December 14, 2015, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
21 subject to forfeiture.

22 8. By Stipulation and Order filed December 15, 2015, the parties stipulated to extend to
23 February 12, 2016, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
25 subject to forfeiture.

26 9. By Stipulation and Order filed February 18, 2016, the parties stipulated to extend to April
27 12, 2016, the time in which the United States is required to file a civil complaint for forfeiture against the
28 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to

1 forfeiture.

2 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
3 to June 10, 2016, the time in which the United States is required to file a civil complaint for forfeiture
4 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
5 subject to forfeiture.

6 11. Accordingly, the parties agree that the deadline by which the United States shall be
7 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
8 alleging that the defendant currency is subject to forfeiture shall be extended to June 10, 2016.

9 Dated: 4/6/16

BENJAMIN B. WAGNER
United States Attorney

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

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13 Dated: 4/6/16

/s/ Stephen A. Munkelt
STEPHEN A. MUNKELT
Attorney for claimant David P. Braut

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15 (Authorized by phone)

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17 **IT IS SO ORDERED.**

18 Dated: April 12, 2016

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UNITED STATES DISTRICT JUDGE