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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 2014 PORSCHE PANAMERA S; VIN:  
 WP0AB2A75EL056429; LICENSE NUMBER:  
 15 7EYU646  
 16 Defendant.

**2:15-mc-0035-MCE-DAD**  
 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 Johnny Luong  
 19 (“claimant”), by and through their respective counsel, as follows:

20 1. On or about January 23, 2015, claimant Johnny Luong filed a claim in the administrative  
 21 forfeiture proceedings with the Drug Enforcement Administration with respect to the 2014 Porsche  
 22 Panamera S; VIN: WP0AB2A75EL056429; LICENSE NUMBER: 7EYU646 (“defendant vehicle”),  
 23 which was seized on October 2, 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  
 27 other than the claimant has filed a claim to the defendant currency as required by law in the  
 28 administrative forfeiture proceeding.

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 proceedings, unless the court extends the deadline for good cause shown or by agreement of  
5 the parties. That deadline is April 23, 2015.

6           4.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
7 June 22, 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 June 22, 2015.

13 Dated:     4/17/15

BENJAMIN B. WAGNER  
United States Attorney

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


17 Dated:     4/17/15

/s/ John S. Harrison  
JOHN S. HARRISON  
Attorney for Claimant Johnny Luong

(Authorized via email)

22 IT IS SO ORDERED.

23 Dated: April 20, 2015

24   
25 \_\_\_\_\_  
MORRISON C. ENGLAND, JR., CHIEF JUDGE  
26 UNITED STATES DISTRICT COURT  
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