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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-00035-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 was April 23, 2015.

6 4. By Stipulation and Order filed April 21, 2015, the parties stipulated to extend to June 22,
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 June 25, 2015, the parties stipulated to extend to July 22,
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 29, 2015, the parties stipulated to extend to August
15 21, 2015, the time in which the United States is required to file a civil complaint for forfeiture against
16 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
17 forfeiture.

18 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
19 September 21, 2015, the time in which the United States is required to file a civil complaint for
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
21 currency is 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 September 21, 2015.

4 Dated: 8/14/15

BENJAMIN B. WAGNER
United States Attorney

5
6 /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

7
8 Dated: 8/14/15

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

10 (Authorized by telephone)

11
12 **ORDER**

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14 IT IS SO ORDERED.

15 Dated: August 19, 2015

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MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT