

1 BENJAMIN B. WAGNER
 United States Attorney
 2 KEVIN C. KHASIGIAN
 Assistant U. S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700
 5 Attorneys for the United States

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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 \$84,359.00 IN U.S.
 CURRENCY,

15 2013 CHEVROLET CAMARO SS, LICENSE
 16 NUMBER 7GXH521, VIN: 2G1FK3DJ7D9224539,

17 2009 HARLEY DAVIDSON, LICENSE NUMBER
 21P6911, VIN: 1HD1GY4319K311293,

18 2007 CHEVROLET AVALANCHE CREW CAB
 19 1500, LICENSE NUMBER 10031T1, VIN:
 3GNEC12017G225993, AND

20 2004 CADILLAC XLR, LICENSE NUMBER
 21 7GXH653, VIN: 1G6YV34A345601665,

22 Defendants.

2:15-MC-00036-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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 24 It is hereby stipulated by and between the United States of America and potential claimant David
 25 Allen Smith (“claimant”), by and through their respective counsel, as follows:

26 1. On or about February 17, 2015, the Citrus Heights Police Department seized the above-
 27 referenced defendant properties as part of a joint investigation with the Bureau of Alcohol, Tobacco,
 28

1 Firearms and Explosives.

2 2. Under 18 U.S.C. §§ 983(a)(1)(A)(iv) and 983 (a)(3)(A), the United States is required to
3 send notice to potential claimants, file a complaint for forfeiture against the defendant properties, and/or
4 obtain an indictment alleging that the defendant properties are subject to forfeiture within ninety days of
5 seizure by the State or local law enforcement agency, unless the court extends the deadline for good
6 cause shown or by agreement of the parties. That deadline is May 18, 2015.

7 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July
8 17, 2015, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant properties and/or to obtain an indictment alleging that the defendant properties are subject to
10 forfeiture.

11 4. Accordingly, the parties agree that the deadline by which the United States shall be
12 required to file a complaint for forfeiture against the defendant properties and/or to obtain an indictment
13 alleging that the defendant properties are subject to forfeiture shall be extended to July 17, 2015.

14 Dated: 4/22/15

BENJAMIN B. WAGNER
United States Attorney

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


17
18 Dated: 4/9/15

/s/ Linda Parisi
LINDA PARISI
Attorney for potential claimant
David Allen Smith

(Authorized by email)

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22 **IT IS SO ORDERED.**

23
24 Dated: April 28, 2015

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