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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 \$34,400.00 IN U.S.
 CURRENCY, and

15 APPROXIMATELY \$21,013.00 IN U.S.
 16 CURRENCY,

17 Defendants.

2:15-MC-00038-TLN-CKD

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

18
 19 It is hereby stipulated by and between the United States of America and claimants Kyle Larson
 20 (“claimants” or “Larson”) and Ryan Raymond (“claimants” or “Raymond”), by and through their
 21 respective counsel, as follows:

22 1. On or about February 2, 2015, claimants Larson and Raymond filed claims in the
 23 administrative forfeiture proceedings with the Drug Enforcement Administration with respect to the
 24 Approximately \$34,400.00 in U.S. Currency (the “Larson defendant currency”) and Approximately
 25 \$21,013.00 in U.S. Currency (the “Raymond defendant currency” and together with the Larson
 26 defendant currency, collectively, the “defendant currency”), which was seized on November 18, 2014.

27 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
 28 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any

1 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person
2 other than the claimants have filed a claim to the defendant currency as required by law in the
3 administrative forfeiture proceeding.

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
5 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
6 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
7 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
8 the parties. That deadline is April 29, 2015.

9 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
10 May 29, 2015, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
12 subject to forfeiture.

13 5. Accordingly, the parties agree that the deadline by which the United States shall be
14 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
15 alleging that the defendant currency is subject to forfeiture shall be extended to May 29, 2015.

16 Dated: 4/27/15

BENJAMIN B. WAGNER
United States Attorney

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

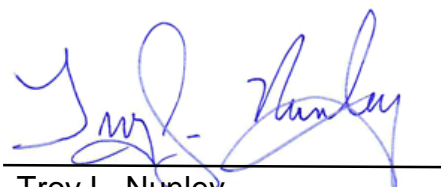
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20 Dated: 4/27/15

/s/ Craig E. Cascarano
CRAIG E. CASCARANO
Attorney for Claimants
Kyle Larson & Ryan Raymond

(Authorized by phone)

21
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23
24 IT IS SO ORDERED

25 Dated: April 30, 2015


Troy L. Nunley
United States District Judge