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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

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 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 was April 29, 2015.

9 4. By Stipulation and Order filed May 1, 2015, the parties stipulated to extend to May 29,  
10 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
14 extend to July 28, 2015, the time in which the United States is required to file a civil complaint for  
15 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
16 currency is subject to forfeiture.

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1           6.       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 July 28, 2015.

4 Dated:     5/26/15

BENJAMIN B. WAGNER  
United States Attorney

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

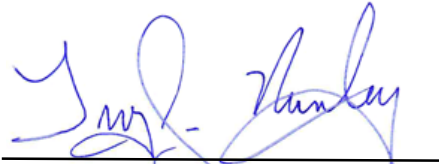
8 Dated:     5/26/15

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

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11                    (Authorized by phone)

12  
13 IT IS SO ORDERED

14 Dated: May 28, 2015

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16                       
Troy L. Nunley  
United States District Judge