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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 \$19,880.00 IN U.S.
CURRENCY,
15 Defendant.

2:15-MC-00047-WBS-KJN

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 Tristram Gray
19 Jensvold (“claimant”), by and through their respective counsel, as follows:

20 1. On or about March 9, 2015, claimant filed a claim in the administrative forfeiture
21 proceeding with the Drug Enforcement Administration with respect to the Approximately \$19,880.00 in
22 U.S. Currency (hereafter “defendant currency”), which was seized on or about December 17, 2014.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
26 than claimant has filed a claim to the defendant currency as required by law in the administrative
27 forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
4 parties. That deadline is June 5, 2015.

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

9 5. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
11 alleging that the defendant currency is subject to forfeiture shall be extended to August 4, 2015.

12 Dated: 5/12/15

BENJAMIN B. WAGNER
United States Attorney

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15 By: /s/ Marilee L. Miller
MARILEE L. MILLER
Assistant U.S. Attorney


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18 Dated: 5/12/15

/s/ David J. Cohen
DAVID J. COHEN, ESQ.
Attorney for claimant Tristram G. Jenvold

(original signature retained by attorney)

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22 **IT IS SO ORDERED.**

23 Dated: May 12, 2015

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25 WILLIAM B. SHUBB
26 UNITED STATES DISTRICT JUDGE