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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 G.  
19 Jenvold (“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 was June 5, 2015.

5 4. By Stipulation and Order filed May 13, 2015, the parties stipulated to extend to August 4,  
6 2015, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

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

13 6. 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 September 18, 2015.

16 Dated: 7/24/15

BENJAMIN B. WAGNER  
United States Attorney

17  
18 By: /s/ Marilee L. Miller  
MARILEE L. MILLER  
Assistant U.S. Attorney


19  
20  
21 Dated: 7/23/15

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

(Authorized by phone)

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23  
24 **IT IS SO ORDERED.**

25 Dated: July 28, 2015

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE