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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.
16

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. By Stipulation and Order filed July 28, 2015, the parties stipulated to extend to September
10 18, 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 6. By Stipulation and Order filed September 21, 2015, the parties stipulated to extend to
14 October 2, 2015, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

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

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