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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$9,000.00 IN U.S.  
CURRENCY,

15 Defendant.

2:15-MC-00062-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 Melvin Magee  
("claimant" or "Magee") by and through their respective counsel, as follows:

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20 1. On or about March 12, 2015, claimant Magee filed a claim in the administrative  
forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately  
21 \$9,000.00 in U.S. Currency, which was seized on November 13, 2014.

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

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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 proceedings, unless the court extends the deadline for good cause shown or by agreement of  
4 the parties. That deadline is June 10, 2015.

5       4.     As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
6 August 7, 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 7, 2015.

12 Dated: 6/3/15

BENJAMIN B. WAGNER  
United States Attorney

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

16 Dated: 6/3/15

/s/ Richard Smith  
RICHARD SMITH  
Attorney for Claimant  
Melvin Magee

(Authorized by phone)

21 IT IS SO ORDERED

22 Dated: June 3, 2015

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE