

1 BENJAMIN B. WAGNER
 United States Attorney
 2 KEVIN C. KHASIGIAN
 Assistant U. S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700
 5 Attorneys for the United States

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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$21,310.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:15-MC-00071-TLN-AC
 STIPULATION AND ORDER
 EXTENDING TIME FOR FILING
 A COMPLAINT FOR FORFEITURE
 AND/OR TO OBTAIN AN INDICTMENT
 ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and claimant Ricardo Curiel
 18 Macedo (“claimant” or “Macedo”) by and through their respective counsel, as follows:

19 1. On or about March 30, 2015, claimant Macedo filed a claim in the administrative
 20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately
 21 \$21,310.00 in U.S. Currency, which was seized on January 28, 2015.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
 23 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.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
 28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline is June 26, 2015.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
5 July 27, 2015, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
7 subject to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to July 27, 2015.

11 Dated: 6/22/15

BENJAMIN B. WAGNER
United States Attorney

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

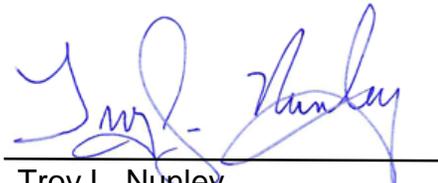
15 Dated: 6/18/15

/s/ Jacek W. Lentz
JACEK W. LENTZ
Attorney for Claimant
Ricardo Curriel Macedo

(authorized via email)

20 IT IS SO ORDERED

21 Dated: June 25, 2015

22
23
24 
Troy L. Nunley
United States District Judge