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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 \$30,480.00 IN U.S.  
CURRENCY,  
15 Defendant.

2:19-MC-00085-WBS-DB

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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17 It is hereby stipulated by and between the United States of America and potential claimant Juan  
18 Benito Graham (“Graham”), by and through their respective counsel, as follows:

19 1. On or about March 19, 2019, claimant Graham filed a claim in the administrative  
20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately  
21 \$30,480.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 1, 2018.

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 claimant has 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 was June 14, 2019.

4 4. By Stipulation and Order filed June 10, 2019, the parties stipulated to extend to August  
5 14, 2019, the time in which the United States is required to file a civil complaint for forfeiture against  
6 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. By Stipulation and Order filed August 14, 2019, the parties stipulated to extend to  
9 October 14, 2019, the time in which the United States is required to file a civil complaint for forfeiture  
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
11 subject to forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
13 extend to December 13, 2019, the time in which the United States is required to file a civil complaint  
14 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
15 currency is subject to forfeiture.

16 7. Accordingly, the parties agree that the deadline by which the United States shall be  
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
18 alleging that the defendant currency is subject to forfeiture shall be extended to December 13, 2019.

19 Dated: 10/4/2019

MCGREGOR W. SCOTT  
United States Attorney

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

24 Dated: 10/4/2019

25 /s/ Carlos K. Johnson  
CARLOS K. JOHNSON  
Attorney for Juan Benito Graham  
26 (As authorized via email)

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1 IT IS SO ORDERED.

2 Dated: October 4, 2019



3 WILLIAM B. SHUBB

4 UNITED STATES DISTRICT JUDGE

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