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

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$95,240.00 IN U.S.
CURRENCY,

15 Defendant.
16

No. 1:17-MC-00030-DAD

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

17 It is hereby stipulated by and between the United States of America and claimant
18 Raymond Richardson (“Claimant”), by and through their respective counsel, as follows:

19 1. On or about February 14, 2017, Claimant filed a claim in the administrative
20 forfeiture proceedings with the Drug Enforcement Administration with respect to the
21 Approximately \$95,240.00 in U.S. Currency (hereafter “Defendant Currency”), which was seized
22 on October 18, 2016.

23 2. The Drug Enforcement Administration has sent the written notice of intent to
24 forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired
25 for any person to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no
26 person other than the claimants has filed a claim to the Defendant Currency as required by law in
27 the administrative forfeiture proceeding.
28

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint
2 for forfeiture against the Defendant Currency and/or to obtain an indictment alleging that the
3 Defendant Currency is subject to forfeiture within ninety days after a claim has been filed in the
4 administrative forfeiture proceedings, unless the court extends the deadline for good cause shown
5 or by agreement of the parties. That deadline is May 15, 2017.

6 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend
7 to July 14, 2017, the time in which the United States is required to file a civil complaint for
8 forfeiture against the Defendant Currency and/or to obtain an indictment alleging that the
9 Defendant Currency is subject to forfeiture.

10 5. Accordingly, the parties agree that the deadline by which the United States shall be
11 required to file a complaint for forfeiture against the Defendant Currency and/or to obtain an
12 indictment alleging that the Defendant Currency is subject to forfeiture shall be extended to July
13 14, 2017.

14 Dated: May 9, 2017

PHILLIP A. TALBERT
United States Attorney

16 /s/ Jeffrey A. Spivak
17 JEFFREY A. SPIVAK
Assistant United States Attorney

19 Dated: May 9, 2017

20 /s/ Thomas S. Brown
21 THOMAS S. BROWN
Attorney for Claimant Raymond Richardson
(As approved by email on 05/09/2017)

23 IT IS SO ORDERED.

24 Dated: May 11, 2017

25 *Dale A. Inghel*
26 UNITED STATES DISTRICT JUDGE