

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

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

2:16-MC-00010-TLN-AC

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$6,350.00 IN U.S.
CURRENCY,

15 Defendant.
16

17
18 It is hereby stipulated by and between the United States of America and potential claimant
19 Gregory Warren (“claimant”), appearing in *propria persona*, as follows:

20 1. On or about October 28, 2015, claimant filed a claim in the administrative forfeiture
21 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$6,350.00 in U.S.
22 Currency (hereafter “defendant currency”), which was seized on or about September 19, 2015.

23 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required
24 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
25 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
26 has filed a claim to the defendant currency as required by law in the 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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline is January 26, 2016.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April
5 25, 2016, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 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 April 25, 2016.

11 Dated: 1/25/16

BENJAMIN B. WAGNER
United States Attorney

12
13 By: /s/ Kevin C. Khasigian
14 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

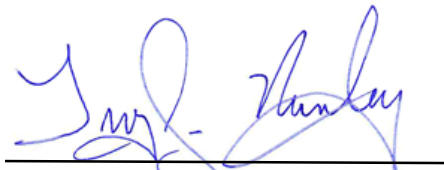
15
16 Dated: 1/25/16

/s/ Gregory Warren
GREGORY WARREN
Claimant, appearing in *propria persona*

(Authorized by phone)

17
18
19
20
21 **IT IS SO ORDERED.**

22 Dated: January 26, 2016

23
24 
25 Troy L. Nunley
United States District Judge