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

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 11 UNITED STATES OF AMERICA,

2:16-MC-00101-MCE-CKD

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 \$177,820.00 IN U.S  
 CURRENCY,

15 APPROXIMATELY \$130,000.00 IN U.S  
 16 CURRENCY,

17 APPROXIMATELY \$50,000.00 IN THE  
 FORM OF A CASHIER'S CHECK,

18 APPROXIMATELY \$8,323.00 IN THE  
 19 FORM OF A CASHIER'S CHECK,

20 APPROXIMATELY \$4,550.00 IN THE  
 FORM OF A CASHIER'S CHECK,  
 21 and

22 APPROXIMATELY \$4,796.00 IN THE  
 FORM OF A CASHIER'S CHECK,

23 Defendants.  
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25 It is hereby stipulated by and between the United States of America and potential claimant Abhijit  
 26 Prasad ("claimant"), by and through his respective counsel, as follows:

27 1. On or about March 29, 2016, the United States State Department, Diplomatic Security  
 28 Service, seized the above-referenced defendant currency and defendant funds pursuant to Federal seizure

1 warrants.

2 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iii), and 983(a)(3)(A), the United States is required to  
3 send notice to potential claimants, file a complaint for forfeiture against the defendant currency and  
4 defendant funds, or obtain an indictment alleging that the defendant currency and defendant funds are  
5 subject to forfeiture within sixty days of seizure, unless the court extends the deadline for good cause  
6 shown or by agreement of the parties. That deadline is May 28, 2016.

7 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
8 August 26, 2016, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant currency and defendant funds and/or to obtain an indictment alleging that the  
10 defendant currency and defendant funds are subject to forfeiture.

11 4. Accordingly, the parties agree that the deadline by which the United States shall be  
12 required to file a complaint for forfeiture against the defendant currency and defendant funds and/or to  
13 obtain an indictment alleging that the defendant currency and defendant funds are subject to forfeiture  
14 shall be extended to August 26, 2016.

15 Dated: 5/26/2016

PHILLIP A. TALBERT  
Acting United States Attorney

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

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20 Dated: 5/25/2016

/s/ Scott L. Tedmon  
SCOTT L. TEDMON  
Attorney for Potential Claimant Abhijit Prasad


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**IT IS SO ORDERED.**

23 **Dated: June 1, 2016**

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MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE

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