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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 \$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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2:16-MC-00101-MCE-CKD

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

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:

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

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

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

13          4.       By Stipulation and Order filed June 2, 2016, the parties stipulated to extend to August 26,  
14 2016, the time in which the United States is required to file a civil complaint for forfeiture against the  
15 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
16 forfeiture.

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1           5.       Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and defendant funds and/or to  
3 obtain an indictment alleging that the defendant currency and defendant funds are subject to forfeiture  
4 shall be extended to November 25, 2016.

5 Dated: 8/24/2016

PHILLIP A. TALBERT  
Acting United States Attorney

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

10 Dated: 8/24/2016

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

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(As authorized via email)

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IT IS SO ORDERED.

15 Dated: August 26, 2016

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MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE

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