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 7
 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.
 24

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:

- 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 was May 28, 2016.

7 3. By Stipulation and Order filed June 2, 2016, the parties stipulated to extend to August 26,
8 2016, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 4. By Stipulation and Order filed August 29, 2016, the parties stipulated to extend to
12 November 25, 2016, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
14 subject to forfeiture.

15 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
16 January 24, 2017, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and defendant funds and/or to obtain an indictment alleging that the
18 defendant currency and defendant funds are subject to forfeiture.

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1 6. 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 January 24, 2017.

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7 Dated: 11/22/2016

PHILLIP A. TALBERT
United States Attorney

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

11
12 Dated: 11/22/2016

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

14 As authorized via email

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16 **IT IS SO ORDERED.**

17 Dated: November 28, 2016

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19 MORRISON C. ENGLAND, JR.
20 UNITED STATES DISTRICT JUDGE