

1 PHILLIP A. TALBERT
 Acting 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
 9 IN THE UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

11
 12 UNITED STATES OF AMERICA,
 13 Plaintiff,
 14 v.
 15 APPROXIMATELY \$8,140.00 IN U.S.
 16 CURRENCY,
 17 Defendant.

2:16-MC-00117-KJM-KJN

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

18 It is hereby stipulated by and between the United States of America and potential claimant Ilyas
 19 Ashirov (“claimant”), by and through their respective counsel, as follows:

20 1. On or about March 21, 2016, claimant filed a claim in the administrative forfeiture
 21 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$8,140.00 in U.S.
 22 Currency (hereafter “defendant currency”), which was seized on or about February 2, 2016.

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 June 19, 2016.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July
5 19, 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 July 19, 2016.

11 Dated: 6/15/16

PHILLIP A. TALBERT
Acting United States Attorney

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

14
15
16 Dated: 6/15/16

/s/ James Kirshner
JAMES KIRSHNER
Attorney for claimant Ilyas Ashirov

(Authorized by phone)

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

22 Dated: June 17, 2016


UNITED STATES DISTRICT JUDGE