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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 \$8,140.00 IN U.S.
 CURRENCY,
 15 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

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

- 19 1. On or about March 21, 2016, claimant filed a claim in the administrative forfeiture
 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$8,140.00 in U.S.
 21 Currency (hereafter “defendant currency”), which was seized on or about February 2, 2016.
- 22 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required
 23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
 24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
 25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.
- 26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
 27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
 28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline was June 19, 2016.

3 4. By Stipulation and Order filed June 17, 2016, the parties stipulated to extend to July 19,
4 2016, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

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

11 6. 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/or to obtain an indictment
13 alleging that the defendant currency is subject to forfeiture shall be extended to August 18, 2016.

14 Dated: 7/14/16

PHILLIP A. TALBERT
Acting United States Attorney

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

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19 Dated: 7/13/16

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

(Authorized by phone)

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24 **IT IS SO ORDERED.**

25 Dated: July 15, 2016

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UNITED STATES DISTRICT JUDGE