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 IN THE UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 11 UNITED STATES OF AMERICA, 2:16-MC-00121-MCE-AC 12 Plaintiff. STIPULATION AND ORDER EXTENDING 13 v. TIME FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN 14 APPROXIMATELY \$6,300.00 IN U.S. INDICTMENT ALLEGING FORFEITURE CURRENCY. 15 Defendant. 16 17 It is hereby stipulated by and between the United States of America and claimant Thomas 18 Previglian ("claimant" or "Previglian"), by and through their respective counsel, as follows: 19 1. On or about April 6, 2016, claimant Previglian filed a claim in the administrative 20 forfeiture proceedings with the United States Postal Inspection Service with respect to the 21 Approximately \$6,300.00 in U.S. Currency. (hereafter "defendant currency"), which was seized on 22 February 11, 2016. 23 2. The United States Postal Inspection Service has sent the written notice of intent to forfeit 24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any 25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person 26 other than the claimant has filed a claim to the defendant currency as required by law in the 27 administrative forfeiture proceeding. 28

- 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline is July 5, 2016.
- 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to August 5, 2016, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 5. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to August 5, 2016.

Dated: 6/30/2016 PHILLIP A. TALBERT Acting United States Attorney

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

Dated: _6/29/2016_____/s/ Jacek W. Lentz

JACEK W. LENTZ Attorney for Claimant Thomas Previglian

(Authorized via email)

IT IS SO ORDERED.

Dated: July 6, 2016

MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE