

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 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$6,300.00 IN U.S.
CURRENCY,

15 Defendant.
16

2:16-MC-00121-MCE-AC

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

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

20 1. On or about April 6, 2016, claimant Previglian filed a claim in the administrative
21 forfeiture proceedings with the United States Postal Inspection Service with respect to the
22 Approximately \$6,300.00 in U.S. Currency. (hereafter “defendant currency”), which was seized on
23 February 11, 2016.

24 2. The United States Postal Inspection Service has sent the written notice of intent to forfeit
25 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
26 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person
27 other than the claimant has filed a claim to the defendant currency as required by law in the
28 administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
5 the parties. That deadline is July 5, 2016.

6 4. By Stipulation and Order filed July 8, 2016, the parties stipulated to extend to August 5,
7 2016, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
11 September 6, 2016, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

14 6. Accordingly, the parties agree that the deadline by which the United States shall be
15 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
16 alleging that the defendant currency is subject to forfeiture shall be extended to September 6, 2016.

17 Dated: 8/2/2016

PHILLIP A. TALBERT
Acting United States Attorney

18
19 /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


20
21 Dated: 8/2/2016

22 /s/ Jacek W. Lentz
JACEK W. LENTZ
Attorney for Claimant
Thomas Previglian

(Authorized via email)

23
24 IT IS SO ORDERED.

25 Dated: August 4, 2016

26
27 
MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE