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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 \$38,240.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:16-MC-00154-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 claimant Hoan Tran
 18 (“claimant” or “Tran”), by and through their respective counsel, as follows:

19 1. On or about June 21, 2016, claimant Tran filed a claim in the administrative forfeiture
 20 proceedings with the United States Postal Inspection Service with respect to the Approximately
 21 \$38,240.00 in U.S. Currency. (hereafter “defendant currency”), which was seized on April 14, 2016.

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

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
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1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
3 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
4 the parties. That deadline is September 19, 2016.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
6 December 19, 2016, the time in which the United States is required to file a civil complaint for
7 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
8 currency is subject to forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
11 alleging that the defendant currency is subject to forfeiture shall be extended to December 19, 2016.

12 Dated: _____

PHILLIP A. TALBERT
Acting United States Attorney

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15 _____
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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17 Dated: _____

HOAN TRAN
Claimant appearing in *Propria*
Persona

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20 IT IS SO ORDERED.

21 Dated: September 22, 2016.

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23 _____
24 UNITED STATES DISTRICT JUDGE
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