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

11
 12 UNITED STATES OF AMERICA,
 13 Plaintiff,
 14 v.
 15 APPROXIMATELY \$16,500.00 IN U.S.
 CURRENCY,
 16 Defendant.
 17

2:16-MC-00163-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 claimant Michael
 19 Henderson (“claimant” or “Henderson”), by and through their respective counsel, as follows:

20 1. On or about July 8, 2016, claimant Henderson filed a claim in the administrative
 21 forfeiture proceedings with the United States Postal Inspection Service with respect to the
 22 Approximately \$16,500.00 in U.S. Currency. (hereafter “defendant currency”), which was seized on
 23 April 6, 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 was October 6, 2016.

6 4. By Stipulation and Order filed October 13, 2016, the parties stipulated to extend to
7 November 7, 2016, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
9 subject to forfeiture.

10 5. By Stipulation and Order filed November 9, 2016, the parties stipulated to extend to
11 December 7, 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. By Stipulation and Order filed December 7, 2016, the parties stipulated to extend to
15 January 6, 2017, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
17 subject to forfeiture.

18 7. By Stipulation and Order filed January 5, 2017, the parties stipulated to extend to
19 February 6, 2017, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
21 subject to forfeiture.

22 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
23 April 6, 2017, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
25 subject to forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to April 6, 2017.

4 Dated: 2/6/2017

PHILLIP A. TALBERT
United States Attorney

5
6 /s/ Kevin C. Khasigian
 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

8 Dated: 2/6/2017

9 /s/ Jacek W. Lentz
 JACEK W. LENTZ
Attorney for Claimant
Michael Henderson

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11 (Authorized via phone)

12 IT IS SO ORDERED.

13 Dated: February 8, 2017

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16 _____
 UNITED STATES DISTRICT JUDGE