1 PHILLIP A. TALBERT 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-00163-KJM-KJN 12 Plaintiff. STIPULATION AND ORDER EXTENDING 13 v. TIME FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN 14 APPROXIMATELY \$16,500.00 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 Michael 18 Henderson ("claimant" or "Henderson"), by and through their respective counsel, as follows: 19 1. On or about July 8, 2016, claimant Henderson filed a claim in the administrative 20 forfeiture proceedings with the United States Postal Inspection Service with respect to the 21 Approximately \$16,500.00 in U.S. Currency. (hereafter "defendant currency"), which was seized on 22 April 6, 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.

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- 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 was October 6, 2016.
- 4. By Stipulation and Order filed October 13, 2016, the parties stipulated to extend to November 7, 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. By Stipulation and Order filed November 9, 2016, the parties stipulated to extend to December 7, 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.
- 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to January 6, 2017, 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.
- 7. 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 January 6, 2017.

Dated:	12/1/2016	PHILLIP A. TALBERT United States Attorney
		/s/ Kevin C. Khasigian KEVIN C. KHASIGIAN Assistant U.S. Attorney
Dated:	11/30/2016	/s/ Jacek W. Lentz JACEK W. LENTZ Attorney for Claimant Michael Henderson (Authorized via email)

IT IS SO ORDERED.

Dated: December 7, 2016

Stipulation to Extend Time to File Complaint