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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

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 11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$7,000.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:16-MC-00192-MCE-CKD

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

It is hereby stipulated by and between the United States of America and claimants Ellena Jackson (“Jackson”) and Mike Pool (“Pool”), by and through their respective counsel, as follows:

1. On or about September 22, 2016, claimants Jackson and Pool filed claims in the administrative forfeiture proceedings with the United States Postal Inspection Service with respect to the Approximately \$7,000.00 in U.S. Currency. (hereafter “defendant currency”), which was seized on July 7, 2016.

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

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

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 was December 21, 2016.

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

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

13 6. By Stipulation and Order filed February 23, 2017, the parties stipulated to extend to
14 March 22, 2017, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
16 subject to forfeiture.

17 7. By Stipulation and Order filed March 23, 2017, the parties stipulated to extend to April
18 21, 2017, the time in which the United States is required to file a civil complaint for forfeiture against
19 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
20 forfeiture.

21 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
22 June 21, 2017, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
24 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 June 21, 2017.

4 Dated: 4/20/2017

PHILLIP A. TALBERT
United States Attorney

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

8
9 Dated: 4/20/2017


/s/ Justin L. Ward
10 JUSTIN L. WARD
11 Attorney for claimants Ellena
Jackson and Mike Pool
12 (Authorized via email)

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14 **ORDER**

15 Pursuant to the stipulation of the parties and good cause appearing, the deadline by which the
16 United States shall be required to file a complaint for forfeiture against the defendant currency and/or to
17 obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to
18 **June 21, 2017.**

19 IT IS SO ORDERED.

20 Dated: April 25, 2017

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22 MORRISON C. ENGLAND, JR.
23 UNITED STATES DISTRICT JUDGE
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