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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 \$7,000.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:16-MC-00192-MCE-CKD

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 claimants Ellena
 18 Jackson (“Jackson”) and Mike Pool (“Pool”), by and through their respective counsel, as follows:

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

28 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 is December 21, 2016.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement 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. 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 January 20, 2017.

12 Dated: 12/20/2016

PHILLIP A. TALBERT
United States Attorney

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

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17 Dated: 12/20/2016

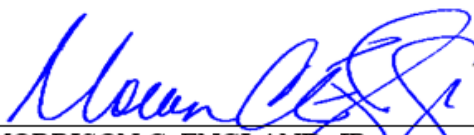
/s/ Justin L. Ward
JUSTIN L. WARD
Attorney for claimants Ellena
Jackson and Mike Pool
(Authorized via phone)

18
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20
21 **ORDER**

22 Pursuant to the above stipulation, the time in which the United States is required to file a civil
23 complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the
24 defendant currency is subject to forfeiture shall be extended to January 20, 2017.

25 IT IS SO ORDERED.

26 Dated: January 5, 2017

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MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE