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 5 Attorneys for the United States

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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 is 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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement 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. Accordingly, the parties agree that the deadline by which the United States shall be  
14 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
15 alleging that the defendant currency is subject to forfeiture shall be extended to February 20, 2017.

16 Dated: 1/18/2017

PHILLIP A. TALBERT  
United States Attorney

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

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21 Dated: 1/18/2017

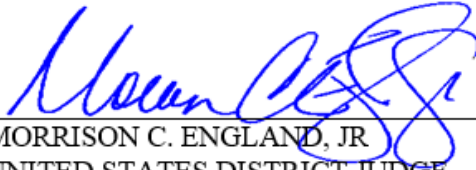
/s/ Justin L. Ward  
JUSTIN L. WARD  
Attorney for claimants Ellena  
Jackson and Mike Pool  
(Authorized via email)

**ORDER**

Pursuant to the above stipulation, the deadline by which 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 shall be extended to February 20, 2017.

IT IS SO ORDERED.

Dated: January 19, 2017

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE

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