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

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

21 8. Accordingly, the parties agree that the deadline by which the United States shall be
22 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
23 alleging that the defendant currency is subject to forfeiture shall be extended to April 21, 2017.

24 Dated: 3/17/2017

PHILLIP A. TALBERT
United States Attorney

25
26 /s/ Kevin C. Khasigian
27 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

1 Dated:

2 3/17/2017

/s/ Justin L. Ward

JUSTIN L. WARD


Attorney for claimants Ellena
Jackson and Mike Pool
(Authorized via email)

7 **ORDER**

8 Pursuant to the parties' stipulation, and good cause appearing, the deadline by which the United
9 States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain
10 an indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 21,
11 2017.

12 IT IS SO ORDERED.

13 Dated: March 22, 2017

14 
15 MORRISON C. ENGLAND, JR.
16 UNITED STATES DISTRICT JUDGE