

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

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

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$138,531.79 IN  
ESCROW PROCEEDS OF 2306  
15 NIGHTINGALE AVE., STOCKTON,  
CALIFORNIA,

16 Defendant.  
17

2:17-MC-00039-WBS-CKD

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

18 It is hereby stipulated by and between the United States of America and claimant Janet  
19 Paniagua (“claimant” or “Paniagua”), by and through their respective counsel, as follows:

20 1. On or about December 8, 2016, claimant Paniagua filed a claim in the administrative  
21 forfeiture proceedings with the Federal Bureau of Investigation (“FBI”) with respect to the  
22 Approximately \$138,531.79 in Escrow Proceeds of 2306 Nightingale Ave., Stockton, California  
23 hereafter “defendant currency”), which was seized on September 2, 2016.

24 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. §  
25 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
26 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed  
27 a claim to the defendant currency as required by law in the 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 March 8, 2017.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
6 June 6, 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 June 6, 2017.

12 Dated: 3/2/17

PHILLIP A. TALBERT  
United States Attorney


13  
14 /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

15  
16  
17 Dated: 3/2/17

/s/ Mark J. Reichel  
MARK J. REICHEL  
Attorney for Janet Paniagua

18  
19 IT IS SO ORDERED.

20 Dated: March 2, 2017

21   
22 WILLIAM B. SHUBB  
23 UNITED STATES DISTRICT JUDGE  
24  
25  
26  
27  
28