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11 IN THE UNITED STATES DISTRICT COURT  
12  
13 EASTERN DISTRICT OF CALIFORNIA

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15 UNITED STATES OF AMERICA,

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17 Plaintiff,

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v.

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20 APPROXIMATELY \$138,531.79 IN  
21 ESCROW PROCEEDS OF 2306  
22 NIGHTINGALE AVE., STOCKTON,  
23 CALIFORNIA,

24

25 Defendant.

26 2:17-MC-00039-WBS-CKD

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

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

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

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37 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. §  
38 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
39 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed  
40 a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

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42 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

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

17 || Dated: 3/2/17

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

IT IS SO ORDERED

20 || Dated: March 2, 2017

William B. Shubb  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE