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

16 Defendant.

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

17  
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 proceeding, unless the court extends the deadline for good cause shown or by agreement of  
4 the parties. That deadline was March 8, 2017.

5 4. By Stipulation and Order filed March 3, 2017, the parties stipulated to extend to June 6,  
6 2017, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9 5. By Stipulation and Order filed May 31, 2017, the parties stipulated to extend to  
10 September 5, 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 August 31, 2017, the parties stipulated to extend to  
14 October 5, 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. By Stipulation and Order filed October 10, 2017, the parties stipulated to extend to  
18 November 6, 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. By Stipulation and Order filed November 3, 2017, the parties stipulated to extend to  
22 January 5, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
24 subject to forfeiture.

25 9. By Stipulation and Order filed December 27, 2017, the parties stipulated to extend to  
26 March 6, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
28 subject to forfeiture.

1           10.     By Stipulation and Order filed March 2, 2018, the parties stipulated to extend to May 4,  
2 2018, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
4 forfeiture.

5           11.     By Stipulation and Order filed May 2, 2018, the parties stipulated to extend to August 2,  
6 2018, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9           12.     By Stipulation and Order filed July 27, 2018, the parties stipulated to extend to October  
10 1, 2018, the time in which the United States is required to file a civil complaint for forfeiture against  
11 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13           13.     By Stipulation and Order filed October 1, 2018, the parties stipulated to extend to  
14 December 31, 2018, the time in which the United States is required to file a civil complaint for  
15 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
16 currency is subject to forfeiture.

17           14.     By Stipulation and Order filed December 21, 2018, the parties stipulated to extend to  
18 April 1, 2019, 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           15.     By Stipulation and Order filed March 28, 2019, the parties stipulated to extend to July 1,  
22 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
23 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
24 forfeiture.

25           16.     By Stipulation and Order filed June 26, 2019, the parties stipulated to extend to  
26 September 30, 2019, the time in which the United States is required to file a civil complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
28 currency is subject to forfeiture.

1           17.     By Stipulation and Order filed September 16, 2019, the parties stipulated to extend to  
2 November 29, 2019, the time in which the United States is required to file a civil complaint for  
3 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
4 currency is subject to forfeiture.

5           18.     By Stipulation and Order filed September 16, 2019, the parties stipulated to extend to  
6 November 29, 2019, the time in which the United States is required to file a civil complaint for  
7 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
8 currency is subject to forfeiture

9           19.     By Stipulation and Order filed November 27, 2019, the parties stipulated to extend to  
10 January 28, 2020, 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           20.     By Stipulation and Order filed January 27, 2020, the parties stipulated to extend to April  
14 23, 2020, the time in which the United States is required to file a civil complaint for forfeiture against  
15 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
16 forfeiture.

17           21.     By Stipulation and Order filed April 15, 2020, the parties stipulated to extend to June 22,  
18 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
20 forfeiture.

21           22.     By Stipulation and Order filed June 17, 2020, the parties stipulated to extend to August  
22 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture against  
23 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
24 forfeiture.

25           23.     By Stipulation and Order filed August 17, 2020, the parties stipulated to extend to  
26 October 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
28 subject to forfeiture.

1           24. By Stipulation and Order filed October 20, 2020, the parties stipulated to extend to  
2 December 21, 2020, the time in which the United States is required to file a civil complaint for  
3 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
4 currency is subject to forfeiture.

5           25. By Stipulation and Order filed December 18, 2020, the parties stipulated to extend to  
6 January 21, 2021, 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           26. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
10 February 22, 2021, 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           27. 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 22, 2021.

16 Dated: 1/20/2021

MCGREGOR W. SCOTT  
United States Attorney


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

17  
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20  
21 Dated: 1/19/2021

/s/ Mark J. Reichel  
MARK J. REICHEL  
Attorney for Janet Paniagua  
(authorized via email)

22  
23  
24 IT IS SO ORDERED.

25 Dated: January 21, 2021

26   
27 WILLIAM B. SHUBB  
28 UNITED STATES DISTRICT JUDGE