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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 \$14,340.00 IN U.S.  
 CURRENCY,  
 15 Defendant.  
 16

2:17-MC-00070-MCE-KJN

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 claimant Eduardo  
 18 Miranda (“Miranda”), by and through their respective counsel, as follows:

19 1. On or about September January 20, 2017, claimant Miranda filed claims in the  
 20 administrative forfeiture proceedings with the United States Postal Inspection Service with respect to  
 21 the Approximately \$14,340.00 in U.S. Currency. (hereafter “defendant currency”), which was seized  
 22 on November 1, 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 April 20, 2017.

5 4. By Stipulation and Order filed April 20, 2017, the parties stipulated to extend to June 19,  
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 June 19, 2017, the parties stipulated to extend to August  
10 18, 2017, 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 6. By Stipulation and Order filed August 15, 2017, the parties stipulated to extend to  
14 October 17, 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 19, 2017, the parties stipulated to extend to  
18 December 18, 2017, the time in which the United States is required to file a civil complaint for  
19 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
20 currency is subject to forfeiture.

21 8. By Stipulation and Order filed January 5, 2018, the parties stipulated to extend to  
22 February 16, 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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
26 extend to March 16, 2018, 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           10.     Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to March 16, 2018.

4 Dated:     2/15/2018

MCGREGOR W. SCOTT  
United States Attorney

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

9 Dated:     2/15/2018

10                                    /s/ Jesse Ortiz  
11                                    JESSE ORTIZ  
12                                    Attorney for claimant  
13                                    Eduardo Miranda  
14                                    (Authorized via email)

15                                    IT IS SO ORDERED.

16 Dated: February 15, 2018

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18   MORRISON C. ENGLAND, JR.  
19   UNITED STATES DISTRICT JUDGE  
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