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

16 Dated: 6/12/2017

PHILLIP A. TALBERT
United States Attorney

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

20
21 Dated: 6/9/2017

/s/ Jesse Ortiz
JESSE ORTIZ
Attorney for claimant
Eduardo Miranda
(Authorized via email)

24 IT IS SO ORDERED.
25 Dated: June 16, 2017

26 
27 MORRISON C. ENGLAND, JR.
28 UNITED STATES DISTRICT JUDGE