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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 \$20,080.00 IN U.S.  
 CURRENCY,  
 15 Defendant.

2:17-MC-00144-KJM-KJN  
 STIPULATION AND ORDER EXTENDING TIME  
 FOR FILING A COMPLAINT FOR FORFEITURE  
 AND/OR TO OBTAIN AN INDICTMENT  
 ALLEGING FORFEITURE

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 17 It is hereby stipulated by and between the United States of America and potential claimant Keith  
 18 Caldwell (“claimant”), by and through their respective counsel, as follows:

19 1. On or about July 3, 2017, claimant filed a claim in the administrative forfeiture proceeding  
 20 with the U.S. Postal Inspection Service with respect to the Approximately \$20,080.00 in U.S. Currency  
 21 (hereafter “defendant currency”), which was seized on April 6, 2017.

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

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
 27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
 28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline is October 1, 2017.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
4 December 28, 2017, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
6 subject to forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be  
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
9 alleging that the defendant currency is subject to forfeiture shall be extended to December 28, 2017.

10 Dated: 9/28/17

PHILLIP A. TALBERT  
United States Attorney

11 By: /s/ Kevin C. Khasigian  
12 KEVIN C. KHASIGIAN  
13 Assistant U.S. Attorney

14  
15 Dated: 9/28/17

/s/ David T. Page  
DAVID T. PAGE  
Attorney for potential claimant  
Keith Caldwell

(Authorized by email)

16  
17  
18  
19 **IT IS SO ORDERED.**

20  
21 Dated: October 4, 2017.

  
UNITED STATES DISTRICT JUDGE