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PHILLIP A. TALBERT 1 **United States Attorney** KEVIN C. KHASIGIAN 2 Assistant U. S. Attorney 501 I Street, Suite 10-100 3 Sacramento, CA 95814 Telephone: (916) 554-2700 4 Attorneys for the United States 5 6 7 IN THE UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 11 UNITED STATES OF AMERICA, 2:17-MC-00156-KJM-AC 12 Plaintiff. STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR FORFEITURE 13 v. AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE APPROXIMATELY \$5,020.00 IN U.S. 14 CURRENCY. 15 Defendant. 16 17 It is hereby stipulated by and between the United States of America and potential claimant 18 Stanley Jackson ("claimant"), by and through their respective counsel, as follows: 19 On or about July 24, 2017, claimant filed a claim in the administrative forfeiture 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$5,020.00 in U.S. 21 Currency (hereafter "defendant currency"), which was seized on May 18, 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

forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was October 20, 2017.

- 4. By Stipulation and Order filed October 20, 2017, the parties stipulated to extend to November 20, 2017, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 5. By Stipulation and Order filed November 22, 2017, the parties stipulated to extend to December 20, 2017, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to January 19, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

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1	7. 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 January 19, 2018.	
4	Dated: <u>12/20/17</u>	PHILLIP A. TALBERT
5	D	United States Attorney
6	By:	/s/ Kevin C. Khasigian KEVIN C. KHASIGIAN Assistant U.S. Attorney
7		Assistant U.S. Attorney
8		
9	Dated: <u>12/19/17</u>	/s/ Scott L. Little SCOTT L. LITTLE
10		Attorney for potential claimant Stanley Jackson
11		(Signature authorized by email)
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14	IT IC CO ODDEDED	
15	IT IS SO ORDERED.	100 000
16	Dated: January 3, 2018.	Mulle
17	(nunc pro tunc to December 20, 2017)	UNITED STATES DISTRICT JUDGE
18 19	December 20, 2017)	
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