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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 \$42,906.72 SEIZED FROM WELLS FARGO
 BANK ACCOUNT NUMBER 2249869062,
 15 Defendant.

2:17-MC-00157-TLN-KJN

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STIPULATION AND ORDER EXTENDING
 TIME FOR FILING A COMPLAINT FOR
 FORFEITURE AND/OR TO OBTAIN AN
 INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and claimants Gregorio Ramirez Castillo and Jennifer Jannette Castillo-Ramirez (“claimants”), by and through their respective counsel, as follows:

1. On or about July 24, 2017, claimants filed claims in the administrative forfeiture proceedings with the Drug Enforcement Administration with respect to the \$42,906.72 seized from Wells Fargo Bank Account Number 2249869062 (hereafter “defendant currency”), which was seized on May 8, 2017.

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

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
5 the parties. That deadline is October 20, 2017.

6 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
7 extend to December 19, 2017, the time in which the United States is required to file a civil complaint
8 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
9 currency is subject to forfeiture.

10 5. Accordingly, the parties agree that the deadline by which the United States shall be
11 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
12 alleging that the defendant currency is subject to forfeiture shall be extended to December 19, 2017.

13 Dated: 10/19/2017

PHILLIP A. TALBERT
United States Attorney

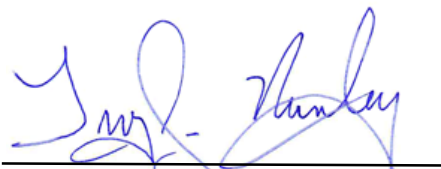
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15 /s/ Kevin C. Khasigian
16 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

17
18 Dated: 10/19/2017

19 /s/ Yan Shrayberman
20 YAN SHRAYBERMAN
Attorney for claimants
21 Gregorio Ramirez Castillo and
Jennifer Jannette Castillo-Ramirez
(Authorized via email)

22 IT IS SO ORDERED.

23 Dated: October 20, 2017

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26 _____
27 Troy L. Nunley
28 United States District Judge