

1 MCGREGOR W. SCOTT  
 United States Attorney  
 2 KEVIN C. KHASIGIAN  
 Assistant U. S. Attorney  
 3 501 I Street, Suite 10-100  
 Sacramento, CA 95814  
 4 Telephone: (916) 554-2700  
 5 Attorneys for the United States

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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 \$42,906.72 SEIZED FROM WELLS FARGO  
 BANK ACCOUNT NUMBER 2249869062,  
 15 Defendant.  
 16

2:17-MC-00157-TLN-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 claimants Gregorio  
 18 Ramirez Castillo and Jennifer Jannette Castillo-Ramirez (“claimants”), by and through their respective  
 19 counsel, as follows:

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

24 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
 25 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
 26 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person  
 27 other than the claimants have filed a claim to the defendant currency as required by law in the  
 28 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 was October 20, 2017.

6           4.       By Stipulation and Order filed October 23, 2017, the parties stipulated to extend to  
7 December 19, 2017, the time in which the United States is required to file a civil complaint for  
8 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds  
9 are subject to forfeiture.

10          5.       By Stipulation and Order filed January 2, 2018, the parties stipulated to extend to  
11 January 19, 2017, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
13 to forfeiture.

14          6.       By Stipulation and Order filed January 19, 2018, the parties stipulated to extend to  
15 February 19, 2017, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
17 to forfeiture.

18          7.       By Stipulation and Order filed February 15, 2018, the parties stipulated to extend to May  
19 21, 2018, the time in which the United States is required to file a civil complaint for forfeiture against  
20 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22          8.       By Stipulation and Order filed May 18, 2018, the parties stipulated to extend to August  
23 20, 2018, the time in which the United States is required to file a civil complaint for forfeiture against  
24 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
25 forfeiture.

26          9.       By Stipulation and Order filed August 13, 2018, the parties stipulated to extend to  
27 November 19, 2018, the time in which the United States is required to file a civil complaint for  
28 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds

1 are subject to forfeiture.

2 10. By Stipulation and Order filed October 24, 2018, the parties stipulated to extend to  
3 January 18, 2019, the time in which the United States is required to file a civil complaint for forfeiture  
4 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
5 to forfeiture.

6 11. By Stipulation and Order filed January 18, 2019, the parties stipulated to extend to  
7 March 19, 2019, the time in which the United States is required to file a civil complaint for forfeiture  
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
9 to forfeiture.

10 12. By Stipulation and Order filed March 20, 2019, the parties stipulated to extend to May  
11 20, 2019, the time in which the United States is required to file a civil complaint for forfeiture against  
12 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
13 forfeiture.

14 13. By Stipulation and Order filed May 21, 2019, the parties stipulated to extend to July 19,  
15 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
17 forfeiture.

18 14. By Stipulation and Order filed July 17, 2019, the parties stipulated to extend to  
19 September 17, 2019, the time in which the United States is required to file a civil complaint for  
20 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds  
21 are subject to forfeiture.

22 15. By Stipulation and Order filed September 13, 2019, the parties stipulated to extend to  
23 November 18, 2019, the time in which the United States is required to file a civil complaint for  
24 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds  
25 are subject to forfeiture.

26 16. By Stipulation and Order filed November 15, 2019, the parties stipulated to extend to  
27 January 2, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
28 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject

1 to forfeiture.

2 17. By Stipulation and Order filed January 3, 2020, the parties stipulated to extend to  
3 February 28, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
4 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
5 to forfeiture.

6 18. By Stipulation and Order filed February 27, 2020, the parties stipulated to extend to  
7 March 30, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
9 to forfeiture.

10 19. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
11 extend to May 29, 2020, the time in which the United States is required to file a civil complaint for  
12 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
13 funds are subject to forfeiture.

14 20. Accordingly, the parties agree that the deadline by which the United States shall be  
15 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
16 alleging that the defendant funds are subject to forfeiture shall be extended to May 29, 2020.

17 Dated: 3/25/2020

MCGREGOR W. SCOTT  
United States Attorney

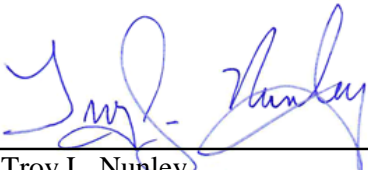
/s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

21 Dated: 3/23/2020

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

25 IT IS SO ORDERED.

26 Dated: March 26, 2020

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Troy L. Nunley  
United States District Judge