

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

6
 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. By Stipulation and Order filed March 26, 2020, the parties stipulated to extend to May
11 29, 2020, 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 20. By Stipulation and Order filed May 26, 2020, the parties stipulated to extend to July 28,
15 2020, 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 21. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
19 extend to August 27, 2020, the time in which the United States is required to file a civil complaint for
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
21 funds are subject to forfeiture.

22 22. Accordingly, the parties agree that the deadline by which the United States shall be
23 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
24 alleging that the defendant funds are subject to forfeiture shall be extended to August 27, 2020.

25 Dated: 7/22/2020

MCGREGOR W. SCOTT
United States Attorney

26
27 /s/ Kevin C. Khasigian
28 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

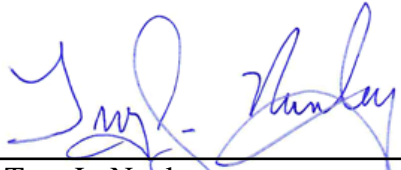
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: 7/22/2020

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

IT IS SO ORDERED.

Dated: July 23, 2020


Troy L. Nunley
United States District Judge