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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8	IN THE UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10			
11	UNITED STATES OF AMERICA,	2:17-MC-00157-TLN-KJN	
12	Plaintiff,	STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE	
13	V.		
14	\$42,906.72 SEIZED FROM WELLS FARGO BANK ACCOUNT NUMBER 2249869062,		
15	Defendant.		
16			
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 funds"), which were seized on		
23	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 funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other		
27	than the claimants have filed a claim to the defendant funds as required by law in the administrative		
28	forfeiture proceeding.	1	

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

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

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

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

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

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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.

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

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

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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. By Stipulation and Order filed July 24, 2020, the parties stipulated to extend to August
19 27, 2020, 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 22. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
23 extend to September 28, 2020, the time in which the United States is required to file a civil complaint
24 for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant
25 funds are subject to forfeiture.

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1	23. 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 funds and/or to obtain an indictment		
3	alleging that the defendant funds are subject to forfeiture shall be extended to September 28, 2020.		
4	Dated: <u>8/25/2020</u>	MCGREGOR W. SCOTT	
5		United States Attorney	
6		/s/ Kevin C. Khasigian KEVIN C. KHASIGIAN	
7		Assistant U.S. Attorney	
8			
9	Dated: <u>8/25/2020</u>	/s/ Yan Shrayberman YAN SHRAYBERMAN	
10		Attorney for claimants Gregorio Ramirez Castillo and	
11		Jennifer Jannette Castillo-Ramirez (Authorized via email)	
12		(Autionzed via cinan)	
13	IT IS SO ORDERED.	$\rightarrow \bigcirc \land \land \land$	
14	Dated: August 25, 2020	Mr. Hunley	
15		Troy L. Nunley	
16		United States District Judge	
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