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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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
11 extend to January 19, 2018, 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 currency is subject to forfeiture.

14 6. 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 currency and/or to obtain an indictment
16 alleging that the defendant currency is subject to forfeiture shall be extended to January 19, 2018.

17 Dated: 12/13/2017

PHILLIP A. TALBERT
United States Attorney

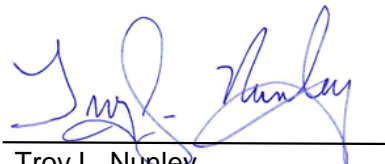
18
19 /s/ Kevin C. Khasigian
20 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

21 Dated: 12/13/2017

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

25 IT IS SO ORDERED.

26 Dated: January 2, 2018

27 
28 Troy L. Nunley
United States District Judge