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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 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           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 funds and/or to obtain an indictment alleging that the defendant funds  
3 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
4 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
5 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. 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. By Stipulation and Order filed August 26, 2020, the parties stipulated to extend to  
23 September 28, 2020, 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 23. By Stipulation and Order filed September 28, 2020, the parties stipulated to extend to  
27 October 28, 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           24. By Stipulation and Order filed October 28, 2020, the parties stipulated to extend to  
3 December 28, 2020, the time in which the United States is required to file a civil complaint for  
4 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds  
5 are subject to forfeiture.

6           25. By Stipulation and Order December 17, 2020, the parties stipulated to extend to  
7 February 26, 2021, 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           26. By Stipulation and Order February 26, 2021, the parties stipulated to extend to April 27,  
11 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
12 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
13 forfeiture.

14           27. By Stipulation and Order April 28, 2021, the parties stipulated to extend to May 27,  
15 2021, 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           28. By Stipulation and Order May 27, 2021, the parties stipulated to extend to June 25,  
19 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22           29. By Stipulation and Order June 25, 2021, the parties stipulated to extend to July 26, 2021,  
23 the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
25 forfeiture.

26           30. By Stipulation and Order July 26, 2021, the parties stipulated to extend to August 26,  
27 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to

1 forfeiture.

2 31. By Stipulation and Order August 26, 2021, the parties stipulated to extend to September  
3 28, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
4 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
5 forfeiture.

6 32. By Stipulation and Order September 28, 2021, the parties stipulated to extend to October  
7 28, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
8 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
9 forfeiture.

10 33. By Stipulation and Order October 28, 2021, the parties stipulated to extend to November  
11 29, 2021, 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 34. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
15 extend to February 28, 2022, the time in which the United States is required to file a civil complaint for  
16 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds  
17 are subject to forfeiture.

18 35. Accordingly, the parties agree that the deadline by which the United States shall be  
19 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
20 alleging that the defendant funds are subject to forfeiture shall be extended to February 28, 2022.

21 Dated: 11/29/2021

PHILLIP A. TALBERT  
Acting United States Attorney

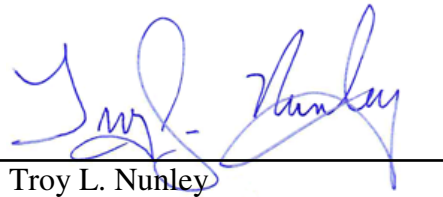
22  
23 /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

24  
25 Dated: 11/29/2021

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

IT IS SO ORDERED.

Dated: November 29, 2021



Troy L. Nunley  
United States District Judge

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