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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 Wells  
 22 Fargo Bank Account Number 2249869062 (hereafter “defendant funds”), which were seized on May 8,  
 23 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 person  
 26 to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the  
 27 claimants have filed a claim to the defendant funds as required by law in the administrative forfeiture  
 28 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 are  
3 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 forfeiture  
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
9 to forfeiture.

10          5.       By Stipulation and Order filed January 2, 2018, the parties stipulated to extend to January  
11 19, 2017, 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 forfeiture.

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

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

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

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

27          10.       By Stipulation and Order filed October 24, 2018, the parties stipulated to extend to January  
28 18, 2019, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

2 11. By Stipulation and Order filed January 18, 2019, the parties stipulated to extend to March  
3 19, 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
4 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

5 12. By Stipulation and Order filed March 20, 2019, the parties stipulated to extend to May 20,  
6 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

8 13. By Stipulation and Order filed May 21, 2019, the parties stipulated to extend to July 19,  
9 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

11 14. By Stipulation and Order filed July 17, 2019, the parties stipulated to extend to September  
12 17, 2019, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

14 15. By Stipulation and Order filed September 13, 2019, the parties stipulated to extend to  
15 November 18, 2019, 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 16. By Stipulation and Order filed November 15, 2019, the parties stipulated to extend to  
19 January 2, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
21 to forfeiture.

22 17. By Stipulation and Order filed January 3, 2020, the parties stipulated to extend to February  
23 28, 2020, 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 forfeiture.

25 18. By Stipulation and Order filed February 27, 2020, the parties stipulated to extend to March  
26 30, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
27 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

28 19. By Stipulation and Order filed March 26, 2020, the parties stipulated to extend to May 29,

1 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
2 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

3 20. By Stipulation and Order filed May 26, 2020, the parties stipulated to extend to July 28,  
4 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

6 21. By Stipulation and Order filed July 24, 2020, the parties stipulated to extend to August  
7 27, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

9 22. By Stipulation and Order filed August 26, 2020, the parties stipulated to extend to  
10 September 28, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
11 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
12 to forfeiture.

13 23. By Stipulation and Order filed September 28, 2020, the parties stipulated to extend to  
14 October 28, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
16 to forfeiture.

17 24. By Stipulation and Order filed October 28, 2020, the parties stipulated to extend to  
18 December 28, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
19 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject  
20 to forfeiture.

21 25. By Stipulation and Order December 17, 2020, the parties stipulated to extend to February  
22 26, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
23 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

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

27 27. By Stipulation and Order April 28, 2021, the parties stipulated to extend to May 27, 2021,  
28 the time in which the United States is required to file a civil complaint for forfeiture against the defendant

1 funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

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

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

8 30. By Stipulation and Order July 26, 2021, the parties stipulated to extend to August 26,  
9 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

11 31. By Stipulation and Order August 26, 2021, the parties stipulated to extend to September  
12 28, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

14 32. By Stipulation and Order September 28, 2021, the parties stipulated to extend to October  
15 28, 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 forfeiture.

17 33. By Stipulation and Order October 28, 2021, the parties stipulated to extend to November  
18 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
19 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

20 34. By Stipulation and Order November 30, 2021, the parties stipulated to extend to February  
21 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
22 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

23 35. By Stipulation and Order February 25, 2022, the parties stipulated to extend to April 29,  
24 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
25 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

26 36. By Stipulation and Order April 28, 2022, the parties stipulated to extend to May 30, 2022,  
27 the time in which the United States is required to file a civil complaint for forfeiture against the defendant  
28 funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

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37. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to June 29, 2022, 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.

38. Accordingly, the parties agree that the deadline by which the United States shall be 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 shall be extended to June 29, 2022.

Dated: 5/26/22

PHILLIP A. TALBERT  
United States Attorney

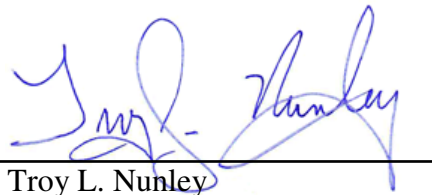
/s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

Dated: 5/26/22

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

IT IS SO ORDERED.

Dated: May 26, 2022



Troy L. Nunley  
United States District Judge