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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 APPROXIMATELY \$40,350.00 IN U.S.  
 CURRENCY,  
 15 Defendant.  
 16

2:17-MC-00161-TLN-AC

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 potential claimant  
 18 NYSDE Motorsports, LLC (“NSYDE”), by and through their respective counsel, as follows:

19 1. On or about July 28, 2017, claimant NSYDE filed a claim in the administrative  
 20 forfeiture proceedings with the United States Postal Inspection Service with respect to the  
 21 Approximately \$40,350.00 in U.S. Currency. (hereafter “defendant currency”), which was seized on  
 22 May 10, 2017.

23 2. The United States Postal Inspection Service has sent the written notice of intent to forfeit  
 24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
 25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person  
 26 other than the claimant has filed a claim to the defendant currency as required by law in the  
 27 administrative forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
3 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
4 the parties. That deadline is October 26, 2017.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
6 extend to November 27, 2017, the time in which the United States is required to file a civil complaint  
7 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
8 currency is subject to forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be  
10 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
11 alleging that the defendant currency is subject to forfeiture shall be extended to November 27, 2017.

12 Dated: 10/26/2017

PHILLIP A. TALBERT  
United States Attorney

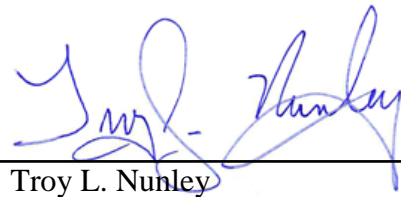
13  
14 /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

15  
16  
17 Dated: 10/26/2017

/s/ Paul F. Adamson  
PAUL F. ADAMSON  
Attorney for claimant  
NYSDE Motorsports, LLC  
(Authorized via email)

18  
19  
20  
21 IT IS SO ORDERED.

22 Dated: October 27, 2017

23  
24   
Troy L. Nunley  
United States District Judge