

1 PHILLIP A. TALBERT
 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

6
 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. By Stipulation and Order filed October 27, 2017, the parties stipulated to extend to
6 November 27, 2017, the time in which the United States is required to file a civil complaint for
7 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
8 currency is subject to forfeiture.

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

13 6. Accordingly, the parties agree that the deadline by which the United States shall be
14 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
15 alleging that the defendant currency is subject to forfeiture shall be extended to December 27, 2017.

16 Dated: 11/21/2017

PHILLIP A. TALBERT
United States Attorney

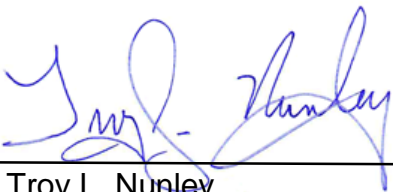
17
18 /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

19
20
21 Dated: 11/21/2017

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

22
23
24
25 IT IS SO ORDERED.

26 Dated: December 5, 2017

27 
Troy L. Nunley
United States District Judge