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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 \$25,000.00 IN U.S.  
 CURRENCY,  
 15 Defendant.

2:17-MC-00162-KJM-CKD  
 STIPULATION AND ORDER EXTENDING TIME  
 FOR FILING A COMPLAINT FOR FORFEITURE  
 AND/OR TO OBTAIN AN INDICTMENT  
 ALLEGING FORFEITURE

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 17 It is hereby stipulated by and between the United States of America and potential claimant Tyler  
 18 Stewart (“claimant”), by and through their respective counsel, as follows:

19 1. On or about August 2, 2017, claimant filed a claim in the administrative forfeiture  
 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$25,000.00 in U.S.  
 21 Currency (hereafter “defendant currency”), which was seized on May 22, 2017.

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

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
 27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
 28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline was October 31, 2017.

3 4. By Stipulation and Order filed November 6, 2017, the parties stipulated to extend to  
4 December 29, 2017, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
6 subject to forfeiture.

7 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
8 to January 29, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
10 subject to forfeiture.

11 6. Accordingly, the parties agree that the deadline by which the United States shall be  
12 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
13 alleging that the defendant currency is subject to forfeiture shall be extended to January 29, 2018.

14 Dated: 12/27/17

PHILLIP A. TALBERT  
United States Attorney

15  
16 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

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18  
19 Dated: 12/27/17

/s/ Jennifer Granger  
JENNIFER GRANGER  
Attorney for potential claimant  
Tyler Stewart

(Signature authorized by phone)

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25 **IT IS SO ORDERED.**

26 Dated: January 16, 2018.

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UNITED STATES DISTRICT JUDGE