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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 \$9,960.00 IN U.S.
CURRENCY,
15 Defendant.

2:17-MC-00163-WBS-KJN

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
18 Brookelyn Nigro (“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 \$9,960.00 in U.S.
21 Currency (hereafter “defendant currency”), which was seized on May 16, 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 is October 31, 2017.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement 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. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
9 alleging that the defendant currency is subject to forfeiture shall be extended to December 29, 2017.

10 Dated: 10/27/17

PHILLIP A. TALBERT
United States Attorney

11 By: /s/ Kevin C. Khasigian
12 KEVIN C. KHASIGIAN
13 Assistant U.S. Attorney

14
15 Dated: 10/27/17

/s/ Jennifer Granger
JENNIFER GRANGER
Attorney for potential claimant
Brookelyn Nigro

(Signature authorized by email)

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21 **IT IS SO ORDERED.**

22 Dated: October 30, 2017



23 WILLIAM B. SHUBB
24 UNITED STATES DISTRICT JUDGE