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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 \$7,960.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:17-MC-00171-TLN-KJN

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 17
 18 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 Angelic Toomer (“claimant”), appearing *in propria persona*, as follows:

19 1. On or about August 14, 2017, claimant filed a claim in the administrative forfeiture
 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$7,960.00 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 is November 12, 2017.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
4 January 11, 2018, 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 January 11, 2018.

10 Dated: 11/3/17

PHILLIP A. TALBERT
United States Attorney

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


14
15 Dated: 11/3/17

/s/ Angelic Toomer
ANGELIC TOOMER
Potential Claimant
Appearing *in propria persona*

(Signature authorized by phone)

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21 **IT IS SO ORDERED.**

22 Dated: November 8, 2017

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24 
25 Troy L. Nunley
26 United States District Judge