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5 Attorneys for the United States

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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

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 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 was November 12, 2017.

3 4. By Stipulation and Order filed November 9, 2017, the parties stipulated 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. By Stipulation and Order filed January 12, 2018, the parties stipulated to extend to  
8 February 9, 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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
12 to March 9, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
14 subject to forfeiture.

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1           7.       Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to March 9, 2018.

4 Dated: 2/7/18

McGREGOR W. SCOTT  
United States Attorney

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

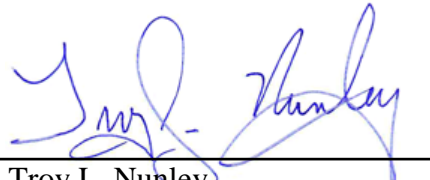
7  
8 Dated: 2/7/18

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

(Signature authorized by phone)

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13           **IT IS SO ORDERED.**

14 Dated: 2/12/2018

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18 Troy L. Nunley  
United States District Judge