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11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 APPROXIMATELY \$21,540.00 IN U.S.
18 CURRENCY,

19 Defendant.

20 2:17-MC-00172-KJM-KJN

21 STIPULATION AND ORDER EXTENDING TIME
22 FOR FILING A COMPLAINT FOR FORFEITURE
23 AND/OR TO OBTAIN AN INDICTMENT
24 ALLEGING FORFEITURE

25 It is hereby stipulated by and between the United States of America and potential claimants Steve
26 L. Thomas and Paul Bryce Wells (“claimants”), appearing *in propria persona*, as follows:

27 1. On or about August 14, 2017, claimant Paul Bryce Wells filed a claim in the
28 administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the
Approximately \$21,540.00 in U.S. Currency (hereafter “defendant currency”), which was seized on April
18, 2017.

29 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
30 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
31 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
32 than claimant has filed a claim to the defendant currency as required by law in the administrative
33 forfeiture proceeding.

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1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was November 12, 2017.

6 4. By Stipulation and Order filed November 14, 2017, the parties stipulated to extend to
7 December 12, 2017, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
9 subject to forfeiture.

10 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
11 to January 12, 2018, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

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1 6. 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 January 12, 2018.

4 Dated: 11/17/17

PHILLIP A. TALBERT
United States Attorney

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

8 Dated: 11/17/17

9 /s/ Steve L. Thomas
10 STEVE L. THOMAS
11 Potential Claimant
12 Appearing *in propria persona*

13 (Signature authorized by phone)

14 Dated: 11/17/17

15 /s/ Paul Bryce Wells
16 PAUL BRYCE WELLS
17 Potential Claimant
18 Appearing *in propria persona*

19 (Signature authorized by phone)

IT IS SO ORDERED.

Dated: November 22, 2017.


UNITED STATES DISTRICT JUDGE