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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$21,540.00 IN U.S.
CURRENCY,

15 Defendant.
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2:17-MC-00172-KJM-KJN

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 claimants Steve
18 L. Thomas and Paul Bryce Wells ("claimants"), appearing *in propria persona*, as follows:

19 1. On or about August 14, 2017, claimant Paul Bryce Wells filed a claim in the
20 administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the
21 Approximately \$21,540.00 in U.S. Currency (hereafter "defendant currency"), which was seized on April
22 18, 2017.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
26 than claimant has filed a claim to the defendant currency as required by law in the administrative
27 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

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

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8 Dated: 11/17/17

/s/ Steve L. Thomas
STEVE L. THOMAS
Potential Claimant
Appearing *in propria persona*

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10 (Signature authorized by phone)

11
12 Dated: 11/17/17

/s/ Paul Bryce Wells
PAUL BRYCE WELLS
Potential Claimant
Appearing *in propria persona*

13
14 (Signature authorized by phone)

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16 **IT IS SO ORDERED.**

17 Dated: November 22, 2017.

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20 UNITED STATES DISTRICT JUDGE
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