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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 \$21,540.00 IN U.S.  
CURRENCY,  
15 Defendant.

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

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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.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
4 parties. That deadline was November 12, 2017.

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

9 5. By Stipulation and Order filed November 22, 2017, the parties stipulated to extend to  
10 January 12, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
12 subject to forfeiture.

13 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
14 to February 8, 2018, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
16 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 February 8, 2018.

4 Dated: 1/8/18

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: 1/8/18

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

(Signature authorized by phone)

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10  
11  
12 Dated: 1/8/18

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

(Signature authorized by phone)

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16           **IT IS SO ORDERED.**

17 Dated: January 10, 2018

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UNITED STATES DISTRICT JUDGE