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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 \$13,200.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:17-mc-00176-MCE-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 claimant Derek
 18 Michael Chrans (“claimant”), by and through their respective counsel, as follows:

19 1. On or about August 21, 2017, claimant filed a claim in the administrative forfeiture
 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$13,200.00 in U.S.
 21 Currency (hereafter “defendant currency”), which was seized on May 25, 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 17, 2017.

3 4. By Stipulation and Order filed November 28, 2017, the parties stipulated to extend to
4 January 16, 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 17, 2018, the parties stipulated to extend to
8 February 15, 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. By Stipulation and Order filed February 15, 2018, the parties stipulated to extend to
12 March 16, 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.

15 7. By Stipulation and Order filed March 20, 2018, the parties stipulated to extend to April
16 30, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 8. By Stipulation and Order filed May 2, 2018, the parties stipulated to extend to May 30,
20 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
22 forfeiture.

23 9. By Stipulation and Order filed June 8, 2018, the parties stipulated to extend to June 29,
24 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
26 forfeiture.

27 10. By Stipulation and Order filed July 3, 2018, the parties stipulated to extend to August 28,
28 2018, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture.

3 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
4 to September 27, 2018, the time in which the United States is required to file a civil complaint for
5 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
6 currency is subject to forfeiture.

7 12. 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 September 27, 2018.

10 Dated: 8/22/18

McGREGOR W. SCOTT
United States Attorney

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


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15 Dated: 8/21/18

/s/ Monroe D. McWard
MONROE D. MCWARD
Attorney for potential claimant
Derek Michael Chrans

(Signature authorized by phone)

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20 **IT IS SO ORDERED.**

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22 Dated: August 24, 2018

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MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE