| 1  | MCGREGOR W. SCOTT   |  |  |  |
|----|---|--|--|--|
| 2  | United States Attorney<br>KEVIN C. KHASIGIAN<br>Assistant U. S. Attorney<br>501 I Street, Suite 10-100<br>Sacramento, CA 95814<br>Telephone: (916) 554-2700 |  |  |  |
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| 5  | Attorneys for the United States   |  |  |  |
| 6  |   |  |  |  |
| 7  |   |  |  |  |
| 8  | IN THE UNITED STATES DISTRICT COURT   |  |  |  |
| 9  | EASTERN DISTRICT OF CALIFORNIA  |  |  |  |
| 10 |   |  |  |  |
| 11 | UNITED STATES OF AMERICA,   | 2:17-MC-00179-TLN-KJN  |  |  |
| 12 | Plaintiff,  | STIPULATION AND ORDER EXTENDING                                  |  |  |
| 13 | v.  | TIME FOR FILING A COMPLAINT FOR                                  |  |  |
| 14 | APPROXIMATELY \$10,000.00 IN U.S.<br>CURRENCY,  | FORFEITURE AND/OR TO OBTAIN AN<br>INDICTMENT ALLEGING FORFEITURE |  |  |
| 15 | Defendant.  |  |  |  |
| 16 |   |  |  |  |
| 17 | It is hereby stipulated by and between the United States of America and potential claimant  |  |  |  |
| 18 | Robert E. Huff ("Huff"), by and through their respective counsel, as follows:   |  |  |  |
| 19 | 1. On or about August 23, 2017, claimant Huff filed a claim in the administrative forfeiture  |  |  |  |
| 20 | proceedings with the United States Postal Inspection Service with respect to the Approximately  |  |  |  |
| 21 | \$10,000.00 in U.S. Currency (hereafter "defendant currency"), which was seized on May 25, 2017.  |  |  |  |
| 22 | 2. The United States Postal Inspection Service has sent the written notice of intent to forfeit   |  |  |  |
| 23 | required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  |  |  |  |
| 24 | person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person  |  |  |  |
| 25 | other than the claimant has filed a claim to the defendant currency as required by law in the   |  |  |  |
| 26 | administrative forfeiture proceeding.   |  |  |  |
| 27 | 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  |  |  |  |
| 28 | forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  |  |  |  |
|    |   | I<br>Stipulation to Extend Time to File Complaint                |  |  |

currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
 the parties. That deadline was November 21, 2017.

4 4. By Stipulation and Order filed December 6, 2017, the parties stipulated to extend to
5 January 22, 2018, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject
7 to forfeiture.

8 5. By Stipulation and Order filed January 19, 2018, the parties stipulated to extend to
9 March 23, 2018, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject
11 to forfeiture.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
extend to May 22, 2018, the time in which the United States is required to file a civil complaint for
forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
currency is subject to forfeiture.

7. Accordingly, the parties agree that the deadline by which the United States shall be
required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
alleging that the defendant currency is subject to forfeiture shall be extended to May 22, 2018.

| 19<br>20 | Dated: <u>3/23/18</u> | 3/23/18 | MCGREGOR W. SCOTT<br>United States Attorney       |
|----------|-----------------------|---------|---|
| 21       |                       |         | /s/ Kevin C. Khasigian<br>KEVIN C. KHASIGIAN      |
| 22       |                       |         | Assistant U.S. Attorney                           |
| 23       |                       |         |   |
| 24       | Dated:                | 3/23/18 | /s/ Stephana L.M. Femino<br>STEPHANA L.M. FEMINO  |
| 25       |                       |         | Attorney for potential claimant<br>Robert E. Huff |
| 26       |                       |         | (Authorized via phone)                            |
| 27       | ///                   |         |   |
| 28       | ///                   |         |   |
|          |                       |         | 2   |

| 1  | IT IS SO ORDERED.     |  |
|----|-----------------------|--|
| 2  | Dated: March 27, 2018 |  |
| 3  |                       | Jun Hunley                                     |
| 4  |                       |  |
| 5  |                       | Troy L. Nunley<br>United States District Judge |
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