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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$10,000.00 IN U.S.
CURRENCY,

15 Defendant.
16

2:17-MC-00179-TLN-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
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

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 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.

12 6. By Stipulation and Order filed March 28, 2018, the parties stipulated to extend to May
13 22, 2018, the time in which the United States is required to file a civil complaint for forfeiture against
14 the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
15 forfeiture.

16 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
17 extend to July 23, 2018, the time in which the United States is required to file a civil complaint for
18 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
19 currency is subject to forfeiture.

20 8. Accordingly, the parties agree that the deadline by which the United States shall be
21 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
22 alleging that the defendant currency is subject to forfeiture shall be extended to July 23, 2018.

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1 Dated: 5/21/18

MCGREGOR W. SCOTT
United States Attorney

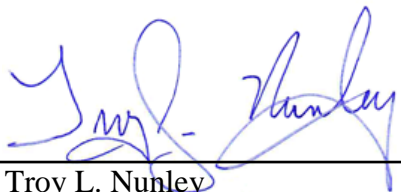
2
3 /s/ Kevin C. Khasigian
4 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

5
6 Dated: 5/21/18

/s/ Stephana L.M. Femino
STEPHANA L.M. FEMINO
Attorney for potential claimant
Robert E. Huff
(Authorized via email)

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10 IT IS SO ORDERED.

11 Dated: May 30, 2018

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14 Troy L. Nunley
United States District Judge