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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 \$41,580.00 IN U.S.
CURRENCY,
15 Defendant.

2:17-MC-00180-KJM-EFB

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 claimant Dillon
18 Michael Orgeron (“claimant”), by and through their respective counsel, as follows:

19 1. On or about August 29, 2017, claimant Dillon Michael Orgeron filed a claim in the
20 administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the
21 Approximately \$41,580.00 in U.S. Currency (hereafter “defendant currency”), which was seized on June
22 26, 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 is November 27, 2017.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
6 January 26, 2018, 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. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
11 alleging that the defendant currency is subject to forfeiture shall be extended to January 26, 2018.

12 Dated: 11/21/17

PHILLIP A. TALBERT
United States Attorney

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

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16 Dated: 11/21/17

/s/ Edward M. Burch
EDWARD M. BURCH
Attorney for potential claimant
Dillon Michael Orgeron

(Signature authorized by email)

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21 **IT IS SO ORDERED.**

22 DATED: November 29, 2017.

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UNITED STATES DISTRICT JUDGE