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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

16  
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 was November 27, 2017.

5 4. By Stipulation and Order filed November 29, 2017, the parties stipulated 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. By Stipulation and Order filed January 17, 2018, the parties stipulated to extend to  
10 February 26, 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 March 26, 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.

17 7. Accordingly, the parties agree that the deadline by which the United States shall be  
18 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
19 alleging that the defendant currency is subject to forfeiture shall be extended to March 26, 2018.

20 Dated: 2/23/18

McGREGOR W. SCOTT  
United States Attorney

21  
22 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

23  
24 Dated: 2/23/18

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

(Signature authorized by email)

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