1	MCGREGOR W. SCOTT		
2	United States Attorney KEVIN C. KHASIGIAN Assistant U. S. Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700		
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5	Attorneys for the United States		
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8	IN THE UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10			
11	UNITED STATES OF AMERICA,	2:18-MC-00003-MCE-EFB	
12	Plaintiff,	STIPULATION AND ORDER EXTENDING	
13	V.	TIME FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN	
14 15	APPROXIMATELY \$4,300.00 IN U.S. INDICTMENT ALLEGING FORFEITURE CURRENCY,		
16	Defendant.		
17	It is hereby stipulated by and between the United States of America and potential claimant		
18	Alexander Shukla ("Shukla"), appearing in prop	pria persona, as follows:	
19	1. On or about October 16, 2017, claimant Shukla filed a claim in the administrative		
20	forfeiture proceedings with the United States Po	ostal Inspection Service with respect to the	
21	Approximately \$4,300.00 in U.S. Currency. (he	ereafter "defendant currency"), which was seized on	
22	August 5, 2017.		
23	2. The United States Postal Inspection Service 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		
26	other than the claimant has filed a claim to the defendant currency as required by law in the		
27	administrative forfeiture proceeding.		
28	3. Under 18 U.S.C. § 983(a)(3)(A),	the United States is required to file a complaint for	
		1 Stipulation to Extend Time to File Complaint	

forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
 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 January 12, 2018.

4. By Stipulation and Order filed January 12, 2018, the parties stipulated to extend to
March 13, 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.

9 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
10 extend to May 14, 2018, the time in which the United States is required to file a civil complaint for
11 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
12 currency is subject to forfeiture.

6. 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 14, 2018.

16	Dated:	3/13/2018	MCGREGOR W. SCOTT United States Attorney
17			Onited States Attorney
18			/s/ Kevin C. Khasigian
19			KEVIN C. KHASIGIAN Assistant U.S. Attorney
20			
21	Dated:	3/13/2018	/s/ Alexander Shukla ALEXANDER SHUKLA
22			Appearing in <i>Propria Persona</i> (As authorized via phone)
23			(As authorized via phone)
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1	ORDER		
2	Pursuant to the stipulation of the parties and good cause appearing, the deadline by which the		
3	United States shall be required to file a complaint for forfeiture against the defendant currency and/or to		
4	obtain an indictment alleging that the defendant currency is subject to forfeiture is hereby extended to		
5	May 14, 2018.		
6	IT IS SO ORDERED.		
7 8	Dated: March 17, 2018		
9	MORRISON C. ENGLAND, JR		
10	UNITED STATES DISTRICT JUDGE		
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28	3 Stimulation to Extand Time to File Complaint		
	Stipulation to Extend Time to File Complaint		

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