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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 \$80,000.00 IN U.S.
 CURRENCY, and
 15 APPROXIMATELY \$33,740.00 IN U.S.
 16 CURRENCY,
 17 Defendants.

2:18-MC-00005-MCE-DB

STIPULATION AND ORDER EXTENDING TIME
 FOR FILING A COMPLAINT FOR FORFEITURE
 AND/OR TO OBTAIN AN INDICTMENT
 ALLEGING FORFEITURE

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 19 It is hereby stipulated by and between the United States of America and potential claimant Paris
 20 D. Evans (“claimant”), by and through their respective counsel, as follows:

21 1. On or about October 20, 2017, claimant filed a claim in the administrative forfeiture
 22 proceeding with the Drug Enforcement Administration with respect to the Approximately \$80,000.00 in
 23 U.S. Currency and Approximately \$33,740.00 in U.S. Currency (hereafter “defendant currency”), which
 24 was seized on August 14, 2017.

25 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
 26 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
 27 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
 28 than claimant has filed a claim to the defendant currency as required by law in the administrative

1 forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
3 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
4 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
5 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
6 parties. That deadline was January 18, 2018.

7 4. By Stipulation and Order filed January 17, 2018, the parties stipulated to extend to
8 February 16, 2018, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
10 subject to forfeiture.

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

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

18 Dated: 2/8/18

McGREGOR W. SCOTT
United States Attorney

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

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22 Dated: 2/8/18

/s/ Jonathan M. Brayman
JONATHAN M. BRAYMAN
Attorney for potential claimant
Paris D. Evans

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24 (Signature authorized by phone)

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ORDER

Pursuant to the stipulation of the parties, 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 not later than **April 17, 2018**.

IT IS SO ORDERED.

Dated: February 15, 2018


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE