

1 McGREGOR W. SCOTT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5 Attorneys for the United States

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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. By Stipulation and Order filed February 15, 2018, the parties stipulated to extend to April
12 17, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 6. By Stipulation and Order filed April 20, 2018, the parties stipulated to extend to May 17,
16 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
20 to June 15, 2018, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
22 subject to forfeiture.

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

4 Dated: 5/14/18

McGREGOR W. SCOTT
United States Attorney

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

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8 Dated: 5/11/18

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


(Signature authorized by email)

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15 **ORDER**

16 Pursuant to the stipulation of the parties and good cause appearing, the deadline by which the
17 United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain
18 an indictment alleging that the defendant currency is subject to forfeiture is hereby extended to June 15,
19 2018.

20 IT IS SO ORDERED.

21 Dated: May 15, 2018

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MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE