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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 \$10,270.00 IN U.S.
CURRENCY, and

15 APPROXIMATELY \$6,100.00 IN U.S.
16 CURRENCY,

17 Defendants.

2:18-MC-00018-TLN-CKD

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 claimants Hugo
20 Huazo Jardinez, Blanca Parra Castillo, Jorge Guzman-Aguilar, and Florencia Huazo Jardinez
21 (“claimants”), by and through their respective counsel, as follows:

22 1. On or about November 20, 2017, claimants filed claims in the administrative forfeiture
23 proceeding with the Drug Enforcement Administration with respect to the Approximately \$10,270.00 in
24 U.S. Currency and Approximately \$6,100.00 in U.S. Currency (hereafter “defendant currency”), which
25 were seized on September 28, 2017.

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

1 than claimants, has filed a claim to the defendant currency as required by law in the administrative
2 forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
5 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
6 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
7 parties. That deadline was February 16, 2018.

8 4. By Stipulation and Order filed February 14, 2018, the parties stipulated to extend to
9 March 16, 2018, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 5. By Stipulation and Order filed March 19, 2018, the parties stipulated to extend to April
13 16, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

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

20 7. By Stipulation and Order filed May 18, 2018, the parties stipulated to extend to July 16,
21 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
22 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
23 forfeiture.

24 8. By Stipulation and Order filed July 17, 2018, the parties stipulated to extend to August 15,
25 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
26 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
27 forfeiture.

28 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend

1 to October 15, 2018, the time in which the United States is required to file a civil complaint for forfeiture
2 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
3 subject to forfeiture.

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

7 Dated: 8/9/18

McGREGOR W. SCOTT
United States Attorney

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

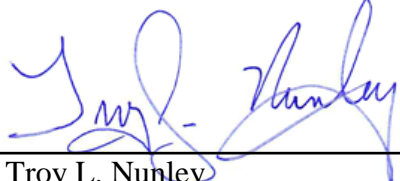
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11
12 Dated: 8/9/18

/s/ Arturo A. Marquez
ARTURO A. MARQUEZ
Attorney for potential claimants Hugo Huazo
Jardinez, Blanca Parra Castillo, Jorge Guzman-
Aguilar, and Florencia Huazo Jardinez

(Signature authorized by phone)

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17 **IT IS SO ORDERED.**

18 Dated: August 10, 2018

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Troy L. Nunley

United States District Judge