1 2 3 4	McGREGOR W. SCOTT United States Attorney KEVIN C. KHASIGIAN Assistant U. S. Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700	
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-00018-TLN-CKD
12	Plaintiff,	STIPULATION AND ORDER EXTENDING TIME
13	v.	FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE
14	APPROXIMATELY \$10,270.00 IN U.S. CURRENCY, and	
15 16	APPROXIMATELY \$6,100.00 IN U.S. CURRENCY,	
17	Defendants.	
18		
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 Stipulation and Order to Extend Time
		Dockets.Justia.

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

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
to May 16, 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.

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1	7. 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 May 16, 2018.		
4	Dated: <u>4/16/18</u>	McGREGOR W. SCOTT United States Attorney	
5	Dave	·	
6	By:	<u>/s/ Kevin C. Khasigian</u> KEVIN C. KHASIGIAN Assistant U.S. Attorney	
7		Assistant 0.5. Attorney	
8			
9 10	Dated: <u>4/16/18</u>	<u>/s/ Arturo A. Marquez</u> ARTURO A. MARQUEZ Attorney for potential claimants Hugo Huazo	
11		Jardinez, Blanca Parra Castillo, Jorge Guzman- Aguilar, and Florencia Huazo Jardinez	
12		(Signature authorized by email)	
13			
14	IT IS SO ORDERED.		
15	Dated: April 17, 2018		
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17 18		Troy L. Nunley	
19		United States District Judge	
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		Stipulation and Order to Extend Tin	