27

28

McGREGOR W. SCOTT 1 **United States Attorney** KEVIN C. KHASIGIAN 2 Assistant U. S. Attorney 501 I Street, Suite 10-100 3 Sacramento, CA 95814 Telephone: (916) 554-2700 4 Attorneys for the United States 5 6 7 IN THE UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 11 UNITED STATES OF AMERICA, 2:18-MC-00048-TLN-DB 12 Plaintiff. STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR FORFEITURE 13 v. AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE 14 APPROXIMATELY \$8,000.00 IN U.S. CURRENCY. 15 Defendant. 16 17 It is hereby stipulated by and between the United States of America and potential claimant 18 Connor Schuman ("claimant"), appearing in propria persona, as follows: 19 1. On or about January 10, 2018, claimant filed a claim in the administrative forfeiture 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$8,000.00 in U.S. 21 Currency (hereafter "defendant currency"), which was seized on October 27, 2017. 22 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required 23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a 24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant 25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding. 26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is 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 within ninety days after a claim has been filed in the administrative

forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the 1 parties. That deadline is April 10, 2018. 2 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May 3 10, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the 4 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to 5 forfeiture. 6 5. Accordingly, the parties agree that the deadline by which the United States shall be 7 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment 8 alleging that the defendant currency is subject to forfeiture shall be extended to May 10, 2018. 10 Dated: 4/10/18 McGREGOR W. SCOTT United States Attorney 11 By: /s/ Kevin C. Khasigian KEVIN C. KHASIGIAN 12 Assistant U.S. Attorney 13 14 15 Dated: 4/10/18 /s/ Connor Schuman CONNOR SCHUMAN 16 Potential Claimant Appearing in propria persona 17 (Signature authorized by phone) 18 19 20 IT IS SO ORDERED. 21 Dated: April 16, 2018 22 23 24 Troy L. Nunley 25 United States District Judge 26 27 28