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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 \$7,000.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:18-MC-00056-TLN-KJN

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

17 It is hereby stipulated by and between the United States of America and potential claimant Erick Geovany Carrera (“claimant”), by and through their respective counsel, as follows:

19 1. On or about January 29, 2018, claimant filed a claim in the administrative forfeiture proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$7,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on December 2, 2017.

22 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant 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

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline is April 27, 2018.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May
4 28, 2018, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
9 alleging that the defendant currency is subject to forfeiture shall be extended to May 28, 2018.

10 Dated: 4/25/18

McGREGOR W. SCOTT
United States Attorney

11 By: /s/ Kevin C. Khasigian
12 KEVIN C. KHASIGIAN
13 Assistant U.S. Attorney

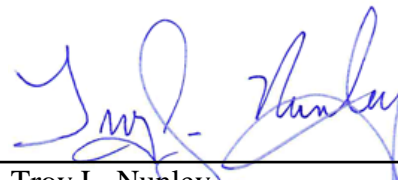
14
15 Dated: 4/25/18

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Erick Geovany Carrera

(Signature authorized by email)

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21 **IT IS SO ORDERED.**

22 Dated: May 7, 2018

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Troy L. Nunley
United States District Judge