

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

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

2:19-MC-00118-WBS-DB

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$7,520.00 IN U.S.
CURRENCY,

15 APPROXIMATELY \$7,600.00 IN U.S.
16 CURRENCY, and

17 APPROXIMATELY \$7,500.00 IN U.S.
18 CURRENCY,

19 Defendants.

20 It is hereby stipulated by and between the United States of America and potential claimant
21 Deangelo Tines (“claimant”), by and through their respective counsel, as follows:

22 1. On or about April 23, 2019, claimant filed a claim in the administrative forfeiture
23 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$7,520.00 in U.S.
24 Currency, Approximately \$7,600.00 in U.S. Currency, and Approximately \$7,500.00 in U.S. Currency
25 (hereafter “defendant currency”), which were seized on February 6, 2019 and February 14, 2019.

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

1 has filed a claim to the defendant currency as required by law in the administrative 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 July 22, 2019.

7 4. By Stipulation and Order filed July 23, 2019, the parties stipulated to extend to October
8 21, 2019, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 5. By Stipulation and Order filed October 21, 2019, the parties stipulated to extend to
12 November 20, 2019, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
14 subject to forfeiture.

15 6. By Stipulation and Order filed November 22, 2019, the parties stipulated to extend to
16 January 17, 2020, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
18 subject to forfeiture.

19 7. By Stipulation and Order filed January 17, 2020, the parties stipulated to extend to March
20 17, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
22 forfeiture.

23 8. By Stipulation and Order filed March 17, 2020, the parties stipulated to extend to May 15,
24 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
26 forfeiture.

27 9. By Stipulation and Order filed May 13, 2020, the parties stipulated to extend to July 14,
28 2020, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture.

3 10. By Stipulation and Order filed July 13, 2020, the parties stipulated to extend to September
4 11, 2020, 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 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
8 to November 10, 2020, the time in which the United States is required to file a civil complaint for
9 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
10 currency is subject to forfeiture.

11 12. Accordingly, the parties agree that the deadline by which the United States shall be
12 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
13 alleging that the defendant currency is subject to forfeiture shall be extended to November 10, 2020.

14
15 Dated: 9/3/2020

McGREGOR W. SCOTT
United States Attorney

16
17 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

18
19 Dated: 9/3/2020

/s/ Stephana Femino
STEPHANA FEMINO
Attorney for potential claimant
Deangelo Tines

(Signature authorized by email)

20
21
22
23 **IT IS SO ORDERED.**

24 Dated: September 4, 2020



25 WILLIAM B. SHUBB
26 UNITED STATES DISTRICT JUDGE
27
28