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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 \$7,520.00 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.

2:19-MC-00118-WBS-DB

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

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. By Stipulation and Order filed September 8, 2020, the parties stipulated to extend to
8 November 10, 2020, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
10 subject to forfeiture.

11 12. By Stipulation and Order filed November 12, 2020, the parties stipulated to extend to
12 December 10, 2020, 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 13. By Stipulation and Order filed December 10, 2020, the parties stipulated to extend to
16 January 8, 2021, 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 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
20 to February 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
22 subject to forfeiture.

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1 15. 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 February 8, 2021.

4 Dated: 1/7/2021

McGREGOR W. SCOTT
United States Attorney

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

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8 Dated: 1/6/2021

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

(Signature authorized by phone)

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12 **IT IS SO ORDERED.**

13 Dated: January 7, 2021



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE