

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,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$56,960.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:19-MC-00163-KJM-CKD

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

16
 17 It is hereby stipulated by and between the United States of America and potential claimant Jared
 18 Dellinger (“Dellinger”), by and through their respective counsel, as follows:

19 1. On or about July 12, 2019, claimant Dellinger filed a claim in the administrative
 20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately
 21 \$56,960.00 in U.S. Currency (hereafter “defendant currency”), which was seized on April 29, 2019.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
 23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
 24 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person
 25 other than the claimant has filed a claim to the defendant currency as required by law in the
 26 administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
 28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline is October 10, 2019.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
5 extend to January 8, 2020, the time in which the United States is required to file a civil complaint for
6 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
7 currency is subject to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to January 8, 2020.

11 Dated: 10/3/2019

MCGREGOR W. SCOTT
United States Attorney

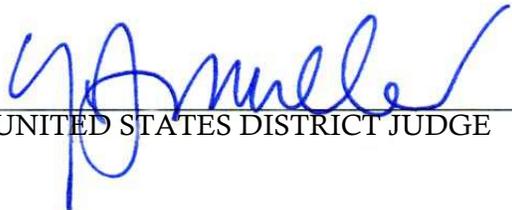
12
13 /s/ Kevin C. Khasigian
14 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

15
16 Dated: 10/3/2019

/s/ Brian L. Michaels
17 BRIAN L. MICHAELS
Attorney for Jared Dellinger
18 (As authorized via email)

19 IT IS SO ORDERED.

20 Dated: 10/4/2019

21 
22 _____
23 UNITED STATES DISTRICT JUDGE
24
25
26
27
28