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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 \$19,500.00 IN
U.S. CURRENCY,

15 Defendant.

2:19-MC-00218-TLN-DB

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

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17 It is hereby stipulated by and between the United States of America and potential claimant Shawn
18 Ovington (“claimant”), appearing *in propria persona*, as follows:

19 1. On or about August 28, 2019, claimant filed a claim in the administrative forfeiture
20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$19,500.00 in U.S.
21 Currency (hereafter “defendant currency”), which was seized on June 11, 2019.

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
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
28 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 was November 26, 2019.

3 4. By Stipulation and Order filed November 26, 2019, the parties stipulated to extend to
4 December 26, 2019, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
6 subject to forfeiture.

7 5. By Stipulation and Order filed December 27, 2019, the parties stipulated to extend to
8 February 24, 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 6. By Stipulation and Order filed February 24, 2020, the parties stipulated to extend to April
12 24, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. By Stipulation and Order filed April 21, 2020, the parties stipulated to extend to June 23,
16 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 8. By Stipulation and Order filed June 19, 2020, the parties stipulated to extend to July 23,
20 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 9. By Stipulation and Order filed July 20, 2020, the parties stipulated to extend to August 21,
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 10. By Stipulation and Order filed August 18, 2020, the parties stipulated to extend to
28 September 21, 2020, the time in which the United States is required to file a civil complaint for forfeiture

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

3 11. By Stipulation and Order filed September 18, 2020, the parties stipulated to extend to
4 November 20, 2020, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
6 subject to forfeiture.

7 12. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
8 to January 19, 2021, 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 13. 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 January 19, 2021.

14 Dated: 11/19/2020

McGREGOR W. SCOTT
United States Attorney

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

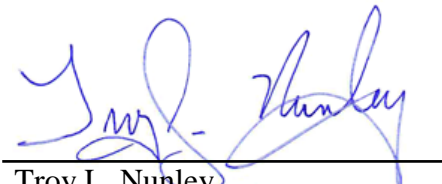
18
19 Dated: 11/19/2020

/s/ Shawn Ovington
SHAWN OVINGTON
Potential Claimant
Appearing *in propria persona*

(Signature authorized by phone)

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23
24 **IT IS SO ORDERED.**

25 Dated: November 19, 2020


Troy L. Nunley
United States District Judge