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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 2019 MERCEDES-BENZ E63 AMG-S, VIN:
 WDDZF8KB8KA608709, CALIFORNIA
 15 LICENSE NUMBER 1UEV351,
 16 APPROXIMATELY 0.041836 BITCOIN,
 17 APPROXIMATELY 18.12902639 BITCOIN,
 18 APPROXIMATELY 26.56443065 BITCOIN,
 19 APPROXIMATELY \$1,712,611.00 IN U.S.
 CURRENCY,
 20 ONE (1) BITCOIN CASASCIUS COIN,
 21 ONE (1) CANADIAN GOLD COIN,
 22 ONE (1) AMERICAN EAGLE GOLD COIN,
 23 ONE (1) CUMMINS ALLISON MONEY
 COUNTER,
 24 APPROXIMATELY \$3,050.00 SEIZED
 FROM LAMASSU BTM LOCATED AT 1301
 25 MACARTHUR BOULEVARD, OAKLAND,
 CALIFORNIA,
 26 APPROXIMATELY \$51,590.00 SEIZED
 FROM LAMASSU BTM LOCATED AT 395
 27
 28

2:20-MC-00072-TLN-EFB

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

1 BIRD AVENUE, SAN JOSE, CALIFORNIA,
2 APPROXIMATELY \$2,475.00 SEIZED
3 FROM LAMASSU BTM LOCATED AT 1310
4 BROADWAY, OAKLAND, CALIFORNIA,
5 APPROXIMATELY \$1,945.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 1305
7 N. BASCOM, SAN JOSE, CALIFORNIA,
8 APPROXIMATELY \$20,090.00 SEIZED
9 FROM LAMASSU BTM LOCATED AT 996
10 PINE STREET, SAN FRANCISCO,
11 CALIFORNIA,
12 APPROXIMATELY \$3,115.00 SEIZED
13 FROM LAMASSU BTM LOCATED AT
14 25757 SOTO ROAD, HAYWARD,
15 CALIFORNIA,
16 APPROXIMATELY \$24,890.00 SEIZED
17 FROM LAMASSU BTM LOCATED AT 1894
18 UNIVERSITY AVENUE, BERKELEY,
19 CALIFORNIA,
20 APPROXIMATELY \$3,800.00 SEIZED
21 FROM LAMASSU BTM LOCATED AT 7500
22 COMMERCIAL BOULEVARD, COTATI,
23 CALIFORNIA,
24 APPROXIMATELY \$3,325.00 SEIZED
25 FROM LAMASSU BTM LOCATED AT
26 14701 SAN PABLO AVENUE, SAN PABLO,
27 CALIFORNIA,
28 APPROXIMATELY \$3,785.00 SEIZED
FROM LAMASSU BTM LOCATED AT 3210
BUSKIRK AVENUE, PLEASANT HILL,
CALIFORNIA,
APPROXIMATELY \$2,835.00 SEIZED
FROM LAMASSU BTM LOCATED AT 605
CONTRA COSTA BOULEVARD,
CONCORD, CALIFORNIA,
APPROXIMATELY \$6,480.00 SEIZED
FROM LAMASSU BTM LOCATED AT 860
ARDEN WAY, SACRAMENTO,
CALIFORNIA,
APPROXIMATELY \$22,660.00 SEIZED
FROM LAMASSU BTM, LOCATED AT
1151 GALLERIA BOULEVARD,
ROSEVILLE, CALIFORNIA,

1 APPROXIMATELY \$14,805.00 SEIZED
2 FROM LAMASSU BTM LOCATED AT 5127
3 FRANKLIN BOULEVARD, SUITE 1,
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 620
7 W. CHARTER WAY, STOCKTON,
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED
10 FROM LAMASSU BTM LOCATED AT 4709
11 FLORIN ROAD, SACRAMENTO,
12 CALIFORNIA,

13 APPROXIMATELY \$6,125.00 SEIZED
14 FROM LAMASSU BTM LOCATED AT 2221
15 DEL PASO ROAD, SACRAMENTO,
16 CALIFORNIA,

17 APPROXIMATELY \$130.00 SEIZED FROM
18 LAMASSU BTM LOCATED AT 1744 N.
19 TEXAS STREET, FAIRFIELD,
20 CALIFORNIA, AND

21 APPROXIMATELY \$5,915.00 SEIZED
22 FROM LAMASSU BTM LOCATED AT 400
23 LINCOLN ROAD EAST, VALLEJO,
24 CALIFORNIA,

25 Defendants.

26 It is hereby stipulated by and between the United States of America and potential claimants
27 Rehan Alvi and Rubina Alvi (“claimants”), by and through their respective counsel as follows:

28 1. On or about November 26, 2019, the Homeland Security Investigations and Federal
Bureau of Investigation seized the above-referenced defendant assets pursuant to Federal seizure
warrants (hereafter collectively “defendant assets”).

2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required
to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or
obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of
seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
deadline was April 17, 2020.

3. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 16,
2020, the time in which the United States is required to file a civil complaint for forfeiture against the

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

3 4. By Stipulation and Order filed June 25, 2020, the parties stipulated to extend to October
4 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture against
5 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
6 forfeiture.

7 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
8 December 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
10 to forfeiture.

11 6. 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 assets and/or to obtain an indictment
13 alleging that the defendant assets are subject to forfeiture shall be extended to December 14, 2020.

14 Dated: 10/13/2020

McGREGOR W. SCOTT
United States Attorney

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

19 Dated: 10/13/2020

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Potential Claimants
Rehan and Rubina Alvi

(Signatures authorized by email)

24 **IT IS SO ORDERED.**

25 Dated: October 14, 2020

26 
Troy L. Nunley
United States District Judge