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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 \$9,960.00 IN  
 U.S. CURRENCY,  
 15 Defendant.

2:20-MC-00073-TLN-CKD

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 Tunisha  
 18 Vance (“claimant”), by and through their respective counsel, as follows:

19 1. On or about January 10, 2020, claimant filed a claim in the administrative forfeiture  
 20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,960.00 in U.S.  
 21 Currency (hereafter “defendant currency”), which was seized on October 26, 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 has  
 25 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 currency  
 28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
2 That deadline was April 9, 2020.

3 4. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 8, 2020,  
4 the time in which the United States is required to file a civil complaint for forfeiture against the defendant  
5 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6 5. By Stipulation and Order filed July 1, 2020, the parties stipulated to extend to September 7,  
7 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

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

14 7. By Stipulation and Order filed October 30, 2020, the parties stipulated to extend to January  
15 5, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
17 forfeiture.

18 8. By Stipulation and Order filed December 31, 2020, the parties stipulated to extend to March  
19 6, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
21 forfeiture.

22 9. By Stipulation and Order filed March 3, 2021, the parties stipulated to extend to April 5,  
23 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
25 forfeiture.

26 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to  
27 May 5, 2021, the time in which the United States is required to file a civil complaint for forfeiture against

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

3 11. Accordingly, the parties agree that the deadline by which the United States shall be required  
4 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
5 the defendant currency is subject to forfeiture shall be extended to May 5, 2021.

6 Dated: 3/31/2021

PHILLIP A. TALBERT  
Acting United States Attorney

7  
8 By: /s/ Kevin C. Khasigian  
9 KEVIN C. KHASIGIAN  
Assistant United States Attorney

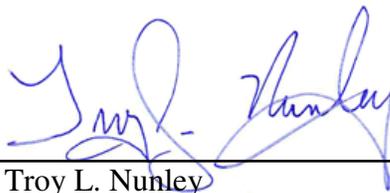
10 Dated: 3/31/2021

11 /s/ Jacek W. Lentz  
12 JACEK W. LENTZ  
Attorney for potential claimant  
Tunisha Vance

13 (Signature authorized by phone)

14 **IT IS SO ORDERED.**

15 Dated: March 31, 2021

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18 Troy L. Nunley  
United States District Judge