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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 \$19,900.00 IN U.S.
 CURRENCY,
 15 Defendant.

2:20-MC-00093 MCE EFB

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

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

19 1. On or about February 20, 2020, claimant Clark filed a claim in the administrative
 20 forfeiture proceedings with the Drug Enforcement Administration with respect to the Approximately
 21 \$19,900.00 in U.S. Currency (hereafter “defendant currency”), which was seized on November 21, 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 person
 24 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than
 25 the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
 26 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 was May 20, 2019.

4 4. By Stipulation and Order filed April 16, 2020, the parties stipulated to extend to August
5 18, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. By Stipulation and Order filed August 18, 2020, the parties stipulated to extend to
9 November 16, 2020, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
13 to January 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture
14 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
15 subject to forfeiture.

16 7. Accordingly, the parties agree that the deadline by which the United States shall be
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
18 alleging that the defendant currency is subject to forfeiture shall be extended to January 15, 2021.

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Dated: 11/13/2020

MCGREGOR W. SCOTT
United States Attorney

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

Dated: 11/13/2020

/s/ Robert J. Beles
ROBERT J. BELES
Beles & Beles Law Office
Attorney for Christopher Anthony
Clark
(As authorized via email)

IT IS SO ORDERED.

Dated: November 13, 2020


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE