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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 \$59,620.00 IN U.S.  
 CURRENCY,  
 15 Defendant.

2:20-MC-00146-TLN-KJN

**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 Trey  
 18 Suy Lay (“Lay”), by and through their respective counsel, as follows:

19 1. On or about March 23, 2020, claimant Lay filed a claim in the administrative forfeiture  
 20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$59,620.00  
 21 in U.S. Currency (hereafter “defendant currency”), which was seized on January 17, 2020.

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 June 19, 2020.

4 4. By Stipulation and Order filed June 15, 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 17, 2020, the parties stipulated to extend to October  
9 19, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12 6. By Stipulation and Order filed October 15, 2020, the parties stipulated to extend to  
13 December 18, 2020, 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. By Stipulation and Order filed December 16, 2020, the parties stipulated to extend to  
17 February 16, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
19 subject to forfeiture.

20 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
21 to April 16, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
22 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
23 subject to forfeiture.

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1           9.       Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
3 alleging that the defendant currency is subject to forfeiture shall be extended to **April 16, 2021**.

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5 Dated: 2/16/2021

MCGREGOR W. SCOTT  
United States Attorney

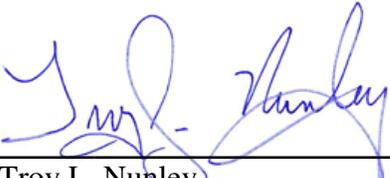
6  
7 /s/ Kevin C. Khasigian  
8 KEVIN C. KHASIGIAN  
Assistant United States Attorney

9  
10 Dated: 2/12/2021

11 /s/ Isaac Safier  
12 ISAAC SAFIER  
Attorney for Trey Suy Lay  
(As authorized via email)

13 **IT IS SO ORDERED.**

14 Dated: February 16, 2021

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16 Troy L. Nunley  
17 United States District Judge  
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