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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.
 16

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

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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
13 to December 18, 2020, the time in which the United States is required to file a civil complaint for
14 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
15 currency is 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 December 18, 2020.

19 Dated: 10/15/2020

MCGREGOR W. SCOTT
United States Attorney

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

24 Dated: 10/15/2020

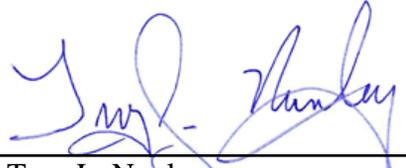
/s/ Isaac Safier
ISAAC SAFIER
Attorney for Trey Suy Lay
(As authorized via email)

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1 IT IS SO ORDERED.

2 Dated: October 15, 2020

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5 Troy L. Nunley
6 United States District Judge
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