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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 \$111,720.00 IN
 U.S. CURRENCY,
 15 Defendant.

2:20-MC-00236-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
 18 William J. Rienzi (“claimant”), by and through their respective counsel, as follows:

19 1. On or about June 23, 2020, claimant filed a claim in the administrative forfeiture
 20 proceeding with the U.S. Customs and Border Protection with respect to the Approximately \$111,720.00
 21 in U.S. Currency (hereafter “defendant currency”), which was seized on or about March 3, 2020.

22 2. The U.S. Customs and Border Protection 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
 24 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
 25 than claimant has filed a claim to the defendant currency as required by law in the administrative
 26 forfeiture 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 proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was September 21, 2020.

4 4. By Stipulation and Order filed September 18, 2020, the parties stipulated to extend to
5 November 20, 2020, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
7 subject to forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
9 to January 19, 2021, 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. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to January 19, 2021.

15 Dated: 11/18/2020

McGREGOR W. SCOTT
United States Attorney

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

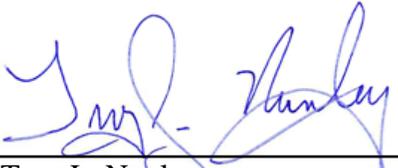
18
19
20 Dated: 11/18/2020

/s/ Samuel D. Berns
SAMUEL D. BERNs
Attorney for potential claimant
William J. Rienzi

(Signature authorized by email)

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25 **IT IS SO ORDERED.**

26 Dated: November 19, 2020

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Troy L. Nunley
United States District Judge