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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 \$37,000.00 IN  
 U.S. CURRENCY,  
 15 Defendant.

2:20-MC-00314-TLN-DB

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

16  
 17 It is hereby stipulated by and between the United States of America and potential claimant Kera  
 18 Barber (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2020, claimant filed a claim in the administrative forfeiture  
 20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
 21 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 24, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
 23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
 24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim  
 25 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 December 24, 2020.

3 4. By Stipulation and Order filed December 17, 2020, the parties stipulated to extend to  
4 February 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
6 to forfeiture.

7 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to March  
8 24, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
10 forfeiture.

11 6. Accordingly, the parties agree that the deadline by which the United States shall be required  
12 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
13 the defendant currency is subject to forfeiture shall be extended to March 24, 2021.

14  
15 Dated: 2/12/21

McGREGOR W. SCOTT  
United States Attorney

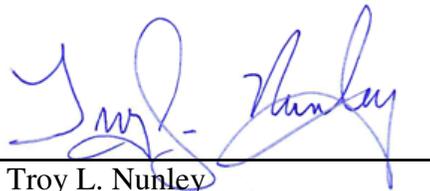
16  
17 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

18  
19  
20 Dated: 2/12/21

/s/ Jacek Lentz  
JACEK LENTZ  
Attorney for potential claimant  
Kera Barber  
(Signature authorized by email)

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24  
25 **IT IS SO ORDERED.**

26 Dated: February 12, 2021

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28  
  
Troy L. Nunley  
United States District Judge