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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 \$24,000.00 IN
U.S. CURRENCY,

15 Defendant.

2:21-MC-00041-WBS-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 Bradley Hoderny (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 23, 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 \$24,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 1, 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
25 claim 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
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline is February 19, 2021.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April
4 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
9 alleging that the defendant currency is subject to forfeiture shall be extended to April 20, 2021.

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11 Dated: 02/16/21

McGREGOR W. SCOTT
United States Attorney

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

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16 Dated: 02/12/21

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Bradley Hoderny
(Signature authorized by email)

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21 **IT IS SO ORDERED.**

22 Dated: February 16, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE