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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$96,189.19 IN  
U.S. CURRENCY,  
  
Defendant.

2:21-MC-00051-TLN-AC

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

It is hereby stipulated by and between the United States of America and potential claimants Zhenhuan Xie and Xiaobing Wang (“claimants”), by and through their respective counsel, as follows:

1. On or about December 1, 2020, claimants filed a claim in the administrative forfeiture proceeding with the U.S. Customs and Border Protection (“CBP”) with respect to the Approximately \$96,189.19 in U.S. Currency (hereafter “defendant currency”), which was seized on October 6, 2020.

2. The CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants have filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency 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 March 1, 2021.

3 4. By Stipulation and Order filed February 25, 2021, the parties stipulated to extend to April  
4 30, 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. By Stipulation and Order filed April 29, 2021, the parties stipulated to extend to June 30,  
8 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. By Stipulation and Order filed June 29, 2021, the parties stipulated to extend to September  
12 28, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
14 forfeiture.

15 7. By Stipulation and Order filed September 28, 2021, the parties stipulated to extend to  
16 November 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
18 to forfeiture.

19 8. By Stipulation and Order filed November 24, 2021, the parties stipulated to extend to  
20 January 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
22 to forfeiture.

23 9. By Stipulation and Order filed January 28, 2022, the parties stipulated to extend to March  
24 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
26 forfeiture.

27 10. By Stipulation and Order filed March 24, 2022, the parties stipulated to extend to May 30,  
28 2022, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
2 forfeiture.

3 11. By Stipulation and Order filed May 25, 2022, the parties stipulated to extend to July 29,  
4 2022, 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 12. By Stipulation and Order filed July 28, 2022, the parties stipulated to extend to September  
8 26, 2022, 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 13. By Stipulation and Order filed September 26, 2022, the parties stipulated to extend to  
12 November 22, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
14 to forfeiture.

15 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to January  
16 20, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the  
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
18 forfeiture.

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1           15.     Accordingly, the parties agree that the deadline by which the United States shall be required  
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
3 the defendant currency is subject to forfeiture shall be extended to January 20, 2023.

4 Dated: 11/21/22

PHILLIP A. TALBERT  
United States Attorney

5  
6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

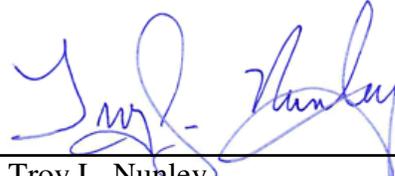
7 Dated: 11/21/22

8 /s/ Mark J. Reichel  
MARK J. REICHEL  
Attorney for potential claimants  
Zhenhuan Xie and Xiaobing Wang

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10 (Signature authorized by phone)

11  
12 **IT IS SO ORDERED.**

13 Dated: November 21, 2022

14   
15 Troy L. Nunley  
United States District Judge