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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 \$163,051.00 IN U.S.
 CURRENCY,
 15 Defendant.
 16

2:21-MC-00228-WBS-JDP

**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 pseudonymous
 18 potential claimant Matthew Thornton (“Thornton”), by and through their respective counsel, as follows:

19 1. On or about June 21, 2021, claimant Thornton filed a claim in the administrative
 20 forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately
 21 \$85,245.00 in U.S. Currency (hereafter “defendant currency”), which was seized on March 22, 2021.

22 2. The United States contends that the Federal Bureau of Investigation has sent the written
 23 notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The
 24 time has expired for any person to file a claim to the defendant currency under 18 U.S.C. §
 25 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as
 26 required by law in the administrative 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 proceedings, unless the court extends the deadline for good cause shown or by agreement of
3 the parties. That deadline is September 19, 2021.

4 4. By Stipulation and Order filed September 20, 2021, the parties stipulated to extend to
5 October 19, 2021, 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. By Stipulation and Order filed October 20, 2021, the parties stipulated to extend to
9 November 18, 2021, the time in which the United States is required to file a civil complaint for
10 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
11 currency is subject to forfeiture.

12 6. By Stipulation and Order filed November 19, 2021, the parties stipulated to extend to
13 December 3, 2021, the time in which the United States is required to file a civil complaint for forfeiture
14 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
15 subject to forfeiture.

16 7. By Stipulation and Order filed December 6, 2021, the parties stipulated to extend to
17 January 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
19 subject to forfeiture.

20 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
21 extend to February 7, 2022, the time in which the United States is required to file a civil complaint for
22 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
23 currency is subject to forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be **EXTENDED** to **February 7, 2022**.

4 Dated: 1/06/2021

PHILLIP A. TALBERT
Acting United States Attorney

5
6 /s/ Kevin C. Khasigian
7 KEVIN C. KHASIGIAN
8 Assistant U.S. Attorney

9 Dated: 1/06/2021

10 /s/ Benjamin N. Gluck
11 Attorney for Matthew Thornton
12 (Authorized via email)

13 **IT IS SO ORDERED.**

14 Dated: January 7, 2022

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16 WILLIAM B. SHUBB
17 UNITED STATES DISTRICT JUDGE