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

16 7. Accordingly, the parties agree that the deadline by which the United States shall be
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
18 alleging that the defendant currency is subject to forfeiture shall be extended to December 3, 2021.

19 Dated: 11/17/2021

PHILLIP A. TALBERT
Acting United States Attorney


21 /s/ Kevin C. Khasigian
22 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

24 Dated: 11/17/2021

25 /s/ Benjamin N. Gluck
Attorney for Matthew Thornton
(Authorized via email)

27 IT IS SO ORDERED.

28 Dated: November 18, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE