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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 \$340,100.00 IN U.S.
CURRENCY,

15 APPROXIMATELY \$200,000.00 IN U.S.
16 CURRENCY,

17 APPROXIMATELY \$85,553.00 IN U.S.
CURRENCY,

18 APPROXIMATELY \$46,657.00 IN U.S.
19 CURRENCY,

20 APPROXIMATELY \$18,650.00 IN U.S.
CURRENCY, AND

21 ASSORTED JEWELRY,

22 Defendants.
23

2:21-MC-00270-WBS-CKD

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

24 It is hereby stipulated by and between the United States of America and potential claimants
25 Owen Coumas (“Coumas”) and Black Diamond Boutique and Gallery, LLC (“Black Diamond”), by
26 and through their respective counsel, as follows:

27 1. On or about August 9, 2021, claimants Coumas and Black Diamond filed claims in the
28 administrative forfeiture proceedings with the Drug Enforcement Administration with respect to the

1 Approximately \$340,100.00 in U.S. Currency, Approximately \$200,000.00 in U.S. Currency,
2 Approximately \$85,883.00 in U.S. Currency, Approximately \$46,657.00 in U.S. Currency,
3 Approximately \$18,650.00 in U.S. Currency and the Assorted Jewelry (hereafter “defendant assets”),
4 which were seized on May 11, 2021.

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

10 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
11 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets
12 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
13 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
14 That deadline was November 7, 2021.

15 4. By Stipulation and Order filed November 8, 2021, the parties stipulated to extend to
16 December 7, 2021, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
18 to forfeiture.

19 5. By Stipulation and Order filed December 8, 2021, the parties stipulated to extend to
20 February 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
22 to forfeiture.

23 6. By Stipulation and Order filed February 7, 2022, the parties stipulated to extend to April
24 8, 2022, the time in which the United States is required to file a civil complaint for forfeiture against
25 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
26 forfeiture.

27 7. By Stipulation and Order filed April 7, 2022, the parties stipulated to extend to June 7,
28 2022, the time in which the United States is required to file a civil complaint for forfeiture against the

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

3 8. By Stipulation and Order filed June 6, 2022, the parties stipulated to extend to August 5,
4 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
6 forfeiture.

7 9. By Stipulation and Order filed August 8, 2022, the parties stipulated to extend to
8 October 4, 2022, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
10 to forfeiture.

11 10. By Stipulation and Order filed October 5, 2022, the parties stipulated to extend to
12 December 3, 2022, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
14 to forfeiture.

15 11. By Stipulation and Order filed December 5, 2022, the parties stipulated to extend to
16 January 31, 2023, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
18 to forfeiture.

19 12. By Stipulation and Order filed February 2, 2023, the parties stipulated to extend to
20 March 31, 2023, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
22 to forfeiture.

23 13. By Stipulation and Order filed March 31, 2023, the parties stipulated to extend to May
24 30, 2023, the time in which the United States is required to file a civil complaint for forfeiture against
25 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
26 forfeiture.

27 14. By Stipulation and Order filed May 31, 2023, the parties stipulated to extend to July 28,
28 2023, the time in which the United States is required to file a civil complaint for forfeiture against the

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

3 15. By Stipulation and Order filed July 26, 2023, the parties stipulated to extend to October
4 23, 2023, the time in which the United States is required to file a civil complaint for forfeiture against
5 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
6 forfeiture.

7 16. By Stipulation and Order filed October 25, 2023, the parties stipulated to extend to
8 December 22, 2023, the time in which the United States is required to file a civil complaint for
9 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets
10 are subject to forfeiture.

11 17. By Stipulation and Order filed December 15, 2023, the parties stipulated to extend to
12 February 20, 2024, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
14 to forfeiture.

15 18. By Stipulation and Order filed February 28, 2024, the parties stipulated to extend to
16 April 19, 2024, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
18 to forfeiture.

19 19. By Stipulation and Order filed April 19, 2024, the parties stipulated to extend to June 18,
20 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
22 forfeiture.

23 20. By Stipulation and Order filed June 18, 2024, the parties stipulated to extend to August
24 16, 2024, the time in which the United States is required to file a civil complaint for forfeiture against
25 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
26 forfeiture.

27 21. By Stipulation and Order filed August 15, 2024, the parties stipulated to extend to
28 September 16, 2024, the time in which the United States is required to file a civil complaint for

1 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets
2 are subject to forfeiture.

3 22. By Stipulation and Order filed September 17, 2024, the parties stipulated to extend to
4 October 16, 2024, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
6 to forfeiture.

7 23. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further
8 extend to November 15, 2024, the time in which the United States is required to file a civil complaint
9 for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant
10 assets are subject to forfeiture.

11 24. Accordingly, the parties agree that the deadline by which the United States shall be
12 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
13 alleging that the defendant assets are subject to forfeiture shall be extended to November 15, 2024.

14 Dated: 10/15/2024

PHILLIP A. TALBERT
United States Attorney


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16 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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18 Dated: 10/15/2024

/s/ Linda M. Parisi
LINDA M. PARISI
Attorney for potential claimants
Owen Coumas and Black Diamond
Boutique and Gallery, LLC
(Signature authorized by phone)

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22 IT IS SO ORDERED.

23 Dated: October 28, 2024


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE