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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 \$13,830.00 IN
 15 U.S. CURRENCY,

16 Defendant.

2:22-MC-00198-MCE-CKD

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 potential claimant Erica
 18 Cardenas (“claimant”), by and through their respective counsel, as follows:

19 1. On or about March 18, 2022, the claimant filed a claim in the administrative forfeiture
 20 proceedings with the Federal Bureau of Investigation with respect to the Approximately \$13,830.00 in U.S.
 21 Currency (hereafter “defendant currency”), which was seized on May 12, 2021.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
 23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
 24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant
 25 has filed a 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 currency
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1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
2 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
3 That deadline was June 16, 2022.

4 4. By Stipulation and Order filed June 29, 2022, the parties stipulated to extend to July 15,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. By Stipulation and Order filed July 18, 2022, the parties stipulated to extend to August 15,
9 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 6. By Stipulation and Order filed August 22, 2022, the parties stipulated to extend to
13 September 14, 2022, 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 subject
15 to forfeiture.

16 7. By Stipulation and Order filed September 21, 2022, the parties stipulated to extend to
17 October 14, 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 subject
19 to forfeiture.

20 8. By Stipulation and Order filed October 25, 2022, the parties stipulated to extend to
21 December 12, 2022, the time in which the United States is required to file a civil complaint for forfeiture
22 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
23 to forfeiture.

24 9. By Stipulation and Order filed December 16, 2022, the parties stipulated to extend to
25 January 11, 2023, the time in which the United States is required to file a civil complaint for forfeiture
26 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
27 to forfeiture.

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1 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to
2 February 10, 2023, the time in which the United States is required to file a civil complaint for forfeiture
3 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
4 to forfeiture.

5 11. Accordingly, the parties agree that the deadline by which the United States shall be required
6 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
7 the defendant currency is subject to forfeiture shall be extended to February 10, 2023.

8 Dated: 01/11/23

PHILLIP A. TALBERT
United States Attorney

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


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14 Dated: 01/10/23

/s/ Melissa Dougherty
MELISSA DOUGHERTY
Attorney for potential claimant
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(Signature authorized by email)

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20 IT IS SO ORDERED.

21 Dated: January 13, 2023

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MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE