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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 UNITED STATES OF AMERICA,

2:22-MC-00225-WBS-JDP

12 Plaintiff,

13 v.

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

14 APPROXIMATELY \$79,527.22 IN U.S.
 CURRENCY, and

15 APPROXIMATELY \$33,000.00 IN U.S.
 16 CURRENCY,

17 Defendants.

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 19 It is hereby stipulated by and between the United States of America and potential claimant Mario
 20 Naranjo Gonzalez (“claimant”), by and through their respective counsel, as follows:

21 1. On or about April 25, 2022, the claimant filed a claim in the administrative forfeiture
 22 proceedings with the Federal Bureau of Investigation with respect to the Approximately \$79,527.22 in
 23 U.S. Currency (hereafter “defendant currency”), which was seized on October 15, 2021.

24 2. On or about May 26, 2022, the claimant filed a claim in the administrative forfeiture
 25 proceedings with the Federal Bureau of Investigation with respect to the Approximately \$33,000.00 in
 26 U.S. Currency (hereafter “defendant currency”), which was seized on March 16, 2022.

27 3. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
 28 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a

1 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the
2 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
3 proceeding. 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint
4 for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
5 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
6 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
7 parties. Those deadlines were July 22, 2022 and August 24, 2022.

8 4. By Stipulation and Order filed July 22, 2022, the parties stipulated to extend to September
9 20, 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 5. By Stipulation and Order filed September 20, 2022, the parties stipulated to extend to
13 November 18, 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
15 subject to forfeiture.

16 6. By Stipulation and Order filed November 9, 2022, the parties stipulated to extend to
17 January 17, 2023, 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 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
21 to February 16, 2023, 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 8. 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 16, 2023.

4 Dated: 1/17/23

PHILLIP A. TALBERT
United States Attorney

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


9 Dated: 1/13/23

/s/ Jakrun Sodhi
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(Signature authorized by email)

16 **IT IS SO ORDERED.**

17 Dated: January 17, 2023


18 WILLIAM B. SHUBB
19 UNITED STATES DISTRICT JUDGE