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

11 UNITED STATES OF AMERICA,
 12 Plaintiff,
 13 v.
 14 APPROXIMATELY \$7,464.64 IN
 U.S. CURRENCY,
 15 Defendant.

2:23-MC-00232-DJC-DB

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 Arnes
 18 Krajinic (“claimant”), by and through their respective counsel, as follows:

19 1. On or about January 17, 2023, agents with the Placer County Special Investigation Unit
 20 seized \$7,414.00 in U.S. Currency incident to arrest. On or about June 7, 2023, the Bureau of Alcohol,
 21 Tobacco, Firearms, and Explosives seized the Approximately \$7,464.64 in U.S. Currency (hereafter
 22 “defendant currency”) pursuant to a federal seizure warrant. The seized amount, \$7,464.64, represents
 23 the \$7,414.00 in cash seized from Krajinic plus the accrued interest on the seized amount (\$50.64) since
 24 the arrest of Krajinic.

25 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
 26 send notice to potential claimants, file a complaint for forfeiture against the defendant currency, or obtain
 27 an indictment alleging that the defendant currency is subject to forfeiture within one hundred and fifty
 28 days of seizure, unless the court extends the deadline for good cause shown or by agreement of the

1 parties. That deadline was June 16, 2023.

2 3. By Stipulation and Order filed June 21, 2023, the parties stipulated to extend to September
3 14, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
4 defendant currency and/or to obtain an indictment that the defendant currency is subject to forfeiture.

5 4. By Stipulation and Order filed September 11, 2023, the parties stipulated to extend to
6 November 13, 2023, the time in which the United States is required to file a civil complaint for forfeiture
7 against the defendant currency and/or to obtain an indictment that the defendant currency is subject to
8 forfeiture.

9 5. By Stipulation and Order filed November 13, 2023, the parties stipulated to extend to
10 February 12, 2024, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant currency and/or to obtain an indictment that the defendant currency is subject to
12 forfeiture.

13 6. By Stipulation and Order filed February 8, 2024, the parties stipulated to extend to May
14 13, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
15 defendant currency and/or to obtain an indictment that the defendant currency is subject to forfeiture.

16 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
17 to August 9, 2024, 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.

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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 August 9, 2024.

4 Dated: 5/10/2024

PHILLIP TALBERT
United States Attorney

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

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8 Dated: 5/10/2024

/s/ David D. Fischer
DAVID D. FISCHER
Attorney for potential claimant
Arnes Krajinic

(Signature authorized by email)

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13 **IT IS SO ORDERED.**

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15 Dated: May 10, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE