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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 \$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

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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. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
10 to February 12, 2024, the time in which the United States is required to file a civil complaint for
11 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
12 currency is subject to forfeiture.

13 6. Accordingly, the parties agree that the deadline by which the United States shall be
14 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
15 alleging that the defendant currency is subject to forfeiture shall be extended to February 12, 2024.

16 Dated: 11/9/2023

PHILLIP TALBERT
United States Attorney

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

19
20 Dated: 11/8/2023

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

(Signature authorized by email)

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25 **IT IS SO ORDERED.**

26 Dated: November 9, 2023

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