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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 \$282,500.00 IN  
 U.S. CURRENCY,  
 15 Defendant.  
 16

2:24-MC-00317-DJC-CKD

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

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 18 It is hereby stipulated by and between the United States of America and potential claimant Ronnie  
 19 Borrego (“claimant”), by and through their respective counsel, as follows:

20 1. On or about May 15, 2024, claimant filed a claim in the administrative forfeiture  
 21 proceeding with the Drug Enforcement Administration with respect to the above-referenced currency  
 22 (hereafter “defendant currency”), which was seized on or about February 9, 2024.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
 24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
 25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
 26 than claimant has filed a claim to the defendant currency as required by law in the administrative  
 27 forfeiture proceeding.

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1           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
5 parties. That deadline was August 13, 2024.

6           4.       By Stipulation and Order filed August 13, 2024, the parties stipulated to extend to October  
7 11, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10          5.       By Stipulation and Order filed October 8, 2024, the parties stipulated to extend to  
11 December 10, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
13 subject to forfeiture.

14          6.       By Stipulation and Order filed December 9, 2024, the parties stipulated to extend to  
15 February 7, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
17 subject to forfeiture.

18          7.       By Stipulation and Order filed February 6, 2025, the parties stipulated to extend to March  
19 10, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
21 forfeiture.

22          8.       As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
23 to April 24, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
25 subject to forfeiture.

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1           9.       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 April 24, 2025.

4 Dated: 3/7/2025

MICHELE BECKWITH  
Acting United States Attorney

5  
6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

7  
8 Dated: 3/7/2025

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for potential claimant  
Ronnie Borrego  
(Authorized by email)

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12           **IT IS SO ORDERED.**

13  
14 Dated: March 10, 2025

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