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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
APPROXIMATELY \$8,800 IN)
AMERICAN EXPRESS TRAVELERS')
CHECKS; AND ONE PENTAX 35mm)
CAMERA, SERIAL NUMBER 1318242,)
)
Defendant.)

No. CV 09-02308 WHA

STIPULATION TO CONTINUE STAY
AND PROPOSED ORDER

Plaintiff, United States of America, and Claimant Gary Hardeman respectfully submit this
Stipulation to Continue the Stay of the instant civil forfeiture action.

On January 5, 2011, Court stayed the instant civil forfeiture case until April 7, 2011, due
to claimant's pending criminal prosecution: United States v. Hardeman, 10-CR-00859 RS. That
stay was continued until September 1, 2011. As Mr. Hardeman's criminal case is still ongoing,
and is scheduled for trial on November 14, 2011, the parties respectfully request an additional
stay of this case, so as not to raise the risk of self-incrimination or adversely affect the ability of
the government to prosecute the related criminal case.

1 For the aforementioned reasons, the parties respectfully request that the current case be
2 stayed for 120 days.

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4 Dated: 9/01/11

/S/ David P. Blank
DANIEL PAUL BLANK
Attorney for Claimant

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6
7 Dated: 9/01/11


/S/ David B. Countryman
DAVID B. COUNTRYMAN
Assistant United States Attorney

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11 ~~PROPOSED~~ ORDER TO STAY
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13 Based upon claimant Gary Hardeman's request to continue the stay of the current
14 forfeiture proceedings, the United States' non-opposition, and for good cause appearing, it is
15 HEREBY ORDERED that the instant case be, and hereby is, STAYED, pursuant to 18 U.S.C.
16 § 981(g) until December 15, 2011. A further case management conference is scheduled for
17 December 15, 2011 at 11 a.m.

18
19 SO ORDERED.

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21 Dated: September 12, 2011


WILLIAM H. ALSUP
United States District Judge