

(SPACE BELOW FOR FILING STAMP ONLY)

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 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10 **SAN FRANCISCO**

11 *****

12 UNITED STATES OF AMERICA,

Case No.: 3:09-cv-2664-WHA

13 Plaintiffs,

STIPULATED REQUEST TO EXTEND
TIME TO FILE ANSWER TO THE
COMPLAINT FOR FORFEITURE

14 v.

15 ONE HEWLETT PACKARD PAVILION
 16 LAPTOP (SERIAL NO. CNF75237NC),
 ADAPTOR, AND VISUAL DEPICTIONS
 ON THE HARD DRIVE,

17 Defendants

18 ANDREW S. HANSON,

19 Real Party in Interest

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21 TO: THE HONORABLE JUDGE OF THE ABOVE-ENTITLED COURT, AND THE
22 PLAINTIFFS, BY AND THROUGH THEIR COUNSEL, NATIALIE K. WIGHT,
23 SPECIAL ASSISTANT UNITED STATE ATTORNEY.

24 Andrew Samuel Hanson, real party in interest, by and through his attorney, Edgar Eugene
25 Page, of Page & Page Attorneys at Law, requests to extend time for Mr. Hanson to file his
26 Answer to the Complaint for Forfeiture in the above-listed case.

27 The attached Declaration of Edgar Eugene Page supports this request. U.S.D.C., N.D.
28 Cal., L.R. 6-2(a).

1 **DECLARATION OF EDGAR EUGENE PAGE**

2 I, EDGAR EUGENE PAGE, do hereby declare that:

- 3 1. I am duly licensed to practice law in the State of California.
- 4 2. I am a member in good standing in the State Bar of California, designated as
5 member number 231147.
- 6 3. I am permitted to practice law before the United States District Court, Northern
7 District of California.
- 8 4. I am permitted to practice law before the United States Circuit Court of Appeals
9 for the Ninth Circuit.
- 10 5. I am permitted to practice law before the Supreme Court of the United States.
- 11 6. I represent Andrew Samuel Hanson, real party in interest, in the matter pending
12 before this court, captioned as United States of America v. One Hewlett Packard
13 Pavilion Laptop (Serial No. CNF75237NC), Adaptor, and Visual Depictions on
14 the Hard Drive, designated as case number 3:09-cv-2664-WHA.
- 15 7. Counsel miscalculated the day to file Mr. Hanson's Answer to the Complaint for
16 Forfeiture; counsel believed that the due date was August 5, 2009, instead the due
17 date was August 4, 2009. U.S.D.C., N.D. Cal., L.R. 6-2(a)(1).
- 18 8. Counsel needs additional time to review the issued related to Mr. Hanson's
19 exercising of his Fifth Amendment rights in any potentially related criminal
20 proceedings. U.S.D.C., N.D. Cal., L.R. 6-2(a)(1).
- 21 9. There have been no other time modifications in this case. U.S.D.C., N.D. Cal.,
22 L.R. 6-2(a)(2).
- 23 10. The requested extension of time would have no effect on the schedule of this case.
24 U.S.D.C., N.D. Cal., L.R. 6-2(a)(3).
- 25 11. Counsel for Mr. Hanson contacted plaintiff's counsel, Natalie K. Wight, Special
26 Assistant United States Attorney, on August 5, 2009, regarding Mr. Hanson's
27 Answer to the Complaint for Forfeiture.
- 28 12. Ms. Wight informed Mr. Page that the government consents to a two-week

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extension, up to and including, August 18, 2009, to file the Answer to the Complaint for Forfeiture in the above-listed case.

13. The foregoing are true and correct to the best of my knowledge and belief at the time of executing this declaration.

EXECUTED under penalty of perjury under the laws of the United States of America, in San Francisco, California.

Dated: August 5, 2009

Respectfully submitted,

Page & Page Attorneys at Law

/s/ Edgar Eugene Page

Attorney for Andrew Hanson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO

4 * * * * *

5 UNITED STATES OF AMERICA,

Case No.: 3:09-cv-2664-WHA

6 Plaintiffs,

PROPOSED ORDER

7 v.

8 ONE HEWLETT PACKARD PAVILION
9 LAPTOP (SERIAL NO. CNF75237NC),
10 ADAPTOR, AND VISUAL DEPICTIONS
11 ON THE HARD DRIVE,

12 Defendants

13 ANDREW S. HANSON,

14 Real Party in Interest

15 PURSUANT TO STIPULATION, IT IS SO ORDERED, that the time for filing the Answer to
16 the Complaint for Forfeiture in the above-listed case is extended August 18, 2009.

17 Dated: August 6, 2009.

18 William H. Alsup, U.S. District Court Judge

