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Attorneys for ANDREW S. HANSON, Real Party in Interest

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

* * * * *

UNITED STATES OF AMERICA,

Plaintiffs,

v.

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

Defendants

ANDREW S. HANSON,

Real Party in Interest

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

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

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

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

The parties have stipulated to a seven day extension of time to August 25, 2009.

The attached Declaration of Edgar Eugene Page supports this request. U.S.D.C., N.D.
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. I have reviewed the issues related to Mr. Hanson’s exercising of his Fifth
16 Amendment rights in this matter as I requested in the previous extension of time.
17 U.S.D.C., N.D. Cal., L.R. 6-2(a)(1).
- 18 8. I have reviewed Title 18, United States Code, Section 981(g)(2) and found that
19 this statute provides for a stay of the civil proceedings to allow a claimant to assert
20 his Fifth Amendment rights.

21 The statute is as follows:

22 “Upon the motion of a claimant, the court shall stay the civil forfeiture
23 proceeding with respect to that claimant if the court determines that--

- 24 (A) the claimant is the subject of a related criminal investigation or
25 case;
26 (B) the claimant has standing to assert a claim in the civil forfeiture
27 proceeding; and
28 (C) continuation of the forfeiture proceeding will burden the right of
the claimant against self-incrimination in the related investigation
or case.”

18 U.S.C § 981(g)(2).

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
16 Answer to the Complaint for Forfeiture in the above-listed case is extended to August 25, 2009

17 Dated: August 20, 2009.

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

