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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA, )  
16 Plaintiff, )  
17 v. )  
18 APPROXIMATELY \$139,740 IN UNITED )  
19 STATES CURRENCY, )  
20 Defendant. )

No. 10- 0186 TEH

STIPULATION TO STAY AND  
~~PROPOSED~~ ORDER

21 Claimant Noni Alexander, by and through her counsel of record Randy Sue Pollock, and  
22 Claimant Brandon Johnson, by and through his counsel of record Jai Gohel, and Assistant United  
23 States Attorney David Countryman, hereby jointly agree to stay the instant case.

24 Claimants Johnson has a related criminal charges pending in Federal District Court for  
25 the Eastern District of Pennsylvania [Case No. 09-cr-00535] and both Johnson and Alexander  
26 have a pending prosecution in Alameda County Superior Court [Case No. 553400A]. Trial in the  
27 Pennsylvania case is currently set for June 28, 2010. Docket No. 10. The currency at issue in  
28 this forfeiture was seized during the arrest in the Alameda County case, which is trailing the  
federal criminal case in Pennsylvania.

1 The allegations in the present forfeiture complaint are related to the allegations at issue in  
2 the related criminal indictments and, consequently, the parties agree that a stay in the forfeiture  
3 proceeding for 180 days is necessary, because continuation of the forfeiture proceeding will  
4 burden the right of the claimant against self-incrimination in the related criminal cases and will  
5 adversely affect the prosecution of the related criminal case.

6  
7 IT IS SO STIPULATED:

JOSEPH P. RUSSONIELLO  
United States Attorney

8  
9 Dated: April 23, 2010

/S/ \_\_\_\_\_  
DAVID COUNTRYMAN  
Assistant United States Attorney

10  
11  
12 Dated: April 23, 2010

/S/ \_\_\_\_\_  
RANDY SUE POLLOCK, ESQ.  
Attorney for Potential Claimant  
Noni Alexander

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15  
16 Dated: April 23, 2010

/S/ \_\_\_\_\_  
JAI MANHAR GOHEL, ESQ.  
Attorney for Potential Claimant  
Brandon Johnson

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18  
19  
20 **ORDER GRANTING STAY**

21 UPON CONSIDERATION of the Stipulation to Stay, the entire record, and for good  
22 cause shown, it is by the Court on this 26th day of April, 2010

23 ORDERED that the instant case be, and hereby is, STAYED, until October 25,  
24 2010, at 1:30 PM pursuant to 18 U.S.C. § 981(g).

25  
26  
27 HONORABLE TH  
United States Distri

