1	MELINDA HAAG (CSBN 132612)		
2	United States Attorney		
3	J. DOUGLAS WILSON (DCBN 412811) Acting Chief, Criminal Division		
4	DAVID B. COUNTRYMAN (CSBN 226995)		
5	Assistant United States Attorney		
6	450 Golden Gate Avenue, 11 <sup>th</sup> Floor San Francisco, CA 94102		
7	Telephone: 415.436.7303 Facsimile: 415.436.7234		
8	Email: david.countryman@usdoj.gov		
9	Attorneys for United States of America		
10			
11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRICT OF CALIFORNIA		
13	UNITED STATES OF AMERICA, )		
14	No. 10- 0186 TEH Plaintiff,		
15	, , , , , , , , , , , , , , , , , , ,		
16	) [ <del>PROPOSED</del> ] ORDER		
17	APPROXIMATELY \$139,740 IN UNITED ) STATES CURRENCY,		
18	Defendant.		
19			
20	D-44:-1 -1-:4 NI: Al d h		
21	Potential claimant Noni Alexander, by and through her counsel of record Randy Sue		
 22	Pollock, and potential claimant Brandon Johnson, by and through his counsel of record Jai		
23	Gohel, and Assistant United States Attorney David Countryman, hereby jointly agree to stay the		
	instant case.		
24	Potential Claimant Johnson has a related criminal charges pending in Federal District		
25	Court for the Eastern District of Pennsylvania [Case No. 09-cr-00535] and both Johnson and		
26	Alexander have a pending prosecution in Alameda County Superior Court [Case No. 553400A].		
27	The preliminary hearing setting conference in Alameda is currently set for December 1, 2010.		
28	Docket No. 10. The currency at issue in this forfeiture was seized during the arrest in the		
	i		

1	Alameda County case, which is trailing the federal criminal case in Pennsylvania.		
2	The allegations in the present forfeiture complaint are related to the allegations at issue in		
3	the related criminal indictments and, consequently, the parties agree that a stay in the forfeiture		
4	proceeding for 90 days is necessary, because continuation of the forfeiture proceeding will		
5	burden the right of the claimant against self-incrimination in the related criminal cases and will		
6	adversely affect the prosecution of the related criminal case.		
7			
8	IT IS SO STIPULATED:	MELINDA HAAG	
9		United States Attorney	
10	Dated: October 19, 2010	/S/	
11	Dated. October 19, 2010	DAVID COUNTRYMAN	
12		Assistant United States Attorney	
13	Dated: October 19, 2010	/S/	
14	Dated. October 19, 2010	RANDY SUE POLLOCK, ESQ.	
15		Attorney for Potential Claimant Noni Alexander	
16			
17	Dated: October 19, 2010	/S/	
18		JAI MANHAR GOHEL, ESQ. Attorney for Potential Claimant	
19		Brandon Johnson	
20			
21	ORDER GRANTING STAY		
22	UPON CONSIDERATION of the Stipulation to Stay, the entire record, and for good		
23	cause shown, it is by the Court on this 22 day of October, 2010.		
24	ORDERED that the instant case be, and hereby is, STAYED, untilJanuary 20, 2011 _,		
25	pursuant to 18 U.S.C. § 981(g).		
26	STATES		
27		HONORABEA	
28		United States I	
		Judge Thelton E. Henderson	
	Stipulation to Stay	2	
		THRN DISTRICT OF CENT	