

1 MELINDA HAAG (CABN 132612)  
United States Attorney

2 J. DOUGLAS WILSON (DCBN 412811)  
3 Chief, Criminal Division

4 STEPHANIE M. HINDS (CABN 154284)  
Assistant United States Attorney

5 450 Golden Gate Avenue, 11th Floor  
6 San Francisco, CA 94102  
7 Telephone: 415.436.7200  
8 Facsimile: 415.436.7234  
Email: [stephanie.hinds@usdoj.gov](mailto:stephanie.hinds@usdoj.gov)

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13	UNITED STATES OF AMERICA,	)	No. CV 12-1724 CRB
14	Plaintiff,	)	STIPULATION AND ORDER CONTINUING
15	v.	)	CASE MANAGEMENT CONFERENCE
16	\$24,500 IN UNITED STATES	)	
17	CURRENCY,	)	
18	Defendant.	)	

19  
20 IT IS HEREBY STIPULATED by and between plaintiff United States of America and  
21 prospective claimants, Travis Ferry and Rachel Fowler, through undersigned counsel, that this action be  
22 stayed pursuant to Title 21, United States Code, Section 881(i) (incorporating the provisions of Title 18,  
23 United States Code, Section 981(g)). The parties contend that Travis Fowler is the subject of a related  
24 criminal investigation being conducted by the Drug Enforcement Administration. As a result of the case  
25 related to that investigation, Travis Ferry has pled guilty and is currently awaiting sentencing on drug  
26 charges in the Central District of Illinois. The parties contend that the conduct underlying the pending  
27 criminal charges in Illinois support, in part, the allegations set forth in the forfeiture complaint in this  
28 district. Consequently, the parties agree that a further stay in the forfeiture proceeding is appropriate in

1 order to preserve the prospective claimants' rights against self-incrimination in the related criminal  
2 matter. The parties thus request that matter be stayed pending resolution of the related criminal  
3 investigation and prosecution. Accordingly, the parties request that the case management conference  
4 currently scheduled for August 23, 2013, be vacated and that the matter be set for further status in  
5 approximately 90 days.

7 DATED: August 23, 2013

8  
9 \_\_\_\_\_/s/\_\_\_\_\_  
STEPHANIE M. HINDS

10 Assistant United States Attorney

12 DATED: August 23, 2013

13  
14 \_\_\_\_\_/s/\_\_\_\_\_  
JEFFREY SCHWARTZ  
15 Attorney for Prospective Claimant Travis Ferry


17 DATED: August 23, 2013

18  
19 \_\_\_\_\_/s/\_\_\_\_\_  
BRIAN J. PETERSON  
20 Attorney for Prospective Claimant Rachel Fowler

21  
22 IT IS HEREBY ORDERED:

23 Upon the stipulation of counsel, and good cause appearing, the above-entitled civil forfeiture  
24 action is stayed in light of the pending related criminal investigation. The matter is continued until  
25 November 22, 2013 at 8:30 a.m. for status.

26  
27 DATED: August 26, 2013

28  
  
\_\_\_\_\_  
CHARLES R. BREYER  
United States District Judge