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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 (REPOSED) ORDER SEEKING STAY OF ACTION
15 v.	}	
16 \$24,500 IN UNITED STATES 17 CURRENCY,	}	
18 Defendant.	}	

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

1 claimants' right against self-incrimination in the related criminal matter. The parties thus request
2 that matter be stayed pending resolution of the related criminal investigation and prosecution.

3 Accordingly, the parties request that the case management conference currently scheduled for July 20,
4 2012, be vacated and that the matter be set for further status in approximately 120 days.

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6 DATED: 7/11/12

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8 _____
9 STEPHANIE M. HINDS
Assistant United States Attorney

10 DATED:

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12 _____
13 JEFFREY SCHWARTZ
14 Attorney for Prospective Claimant Travis Ferry

15 DATED:

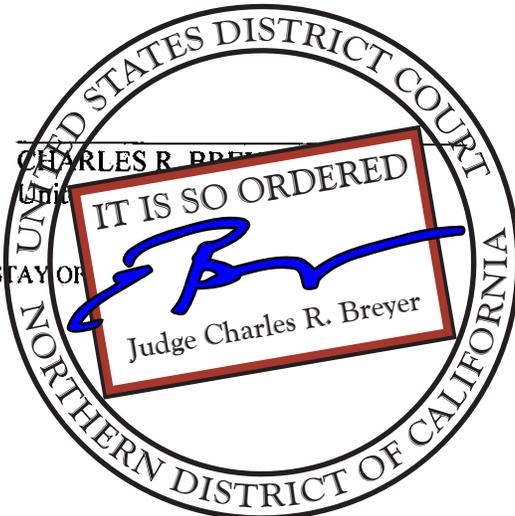
16
17 _____
18 BRIAN J. PETERSON
19 Attorney for Prospective Claimant Rachel Fowler

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21 IT IS HEREBY ORDERED:

22 Upon the stipulation of counsel, and good cause appearing, the above-entitled civil forfeiture
23 action is stayed in light of the pending related criminal investigation. The matter is continued until 8:30
24 12/7/2012 for status.

25 DATED: July 12, 2012

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27
28 STIPULATION AND [PROPOSED] ORDER SEEKING STAY OF
CV 12-1724 CRB



1 claimants' right against self-incrimination in the related criminal matter. The parties thus request
2 that matter be stayed pending resolution of the related criminal investigation and prosecution.
3 Accordingly, the parties request that the case management conference currently scheduled for July 20,
4 2012, be vacated and that the matter be set for further status in approximately 120 days.

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Assistant United States Attorney

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11 DATED: 7/11/12

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13 JEFFREY SCHWARTZ
14 Attorney for Prospective Claimant Travis Ferry

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16 DATED: 7/11/12

17 _____
18 BRIAN J. PETERSON
19 Attorney for Prospective Claimant Rachel Fowler

20
21 IT IS HEREBY ORDERED:

22 Upon the stipulation of counsel, and good cause appearing, the above-entitled civil forfeiture
23 action is stayed in light of the pending related criminal investigation. The matter is continued until _____
24 _____ for status.

25
26 DATED:

27 _____
CHARLES R. BREYER
United States District Judge