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8 Attorneys for Plaintiff

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

13 UNITED STATES OF AMERICA,	)	NO. CV 13-02648-WHO
14 Plaintiff,	)	
15 v.	)	STIPULATION AND ORDER FOR STAY OF
	)	PROCEEDINGS PURSUANT TO 18 U.S.C. §
	)	981(G)(1) AND (2)
16 ONE 2012 TOYOTA TACOMA TRUCK, VIN	)	
17 3TMMU4FNOCM044260;	)	
18 APPROXIMATELY \$28,515.33 IN	)	
19 ASSORTED GOLD AND SILVER BARS AND	)	
20 COINS,	)	
21 Defendants.	)	
	)	
22 ANTHONY PISARSKI,	)	
23 SONNY LEE MOORE,	)	
24 Claimants.	)	

24 IT IS HEREBY STIPULATED by and between Plaintiff United States of America and  
25 Claimants Anthony Pisarski and Sonny Lee Moore, through their respective counsel, that this matter be  
26 stayed pursuant to 18 U.S.C. §981(g)(1) and (2).

27 1. On December 11, 2012, the government commenced a civil forfeiture action by filing a  
28 complaint in *United States v. Approximately \$169,920 in United States Currency, et al.* The case was

1 subsequently assigned to the Honorable Jon S. Tigar (CV 12-06284).

2           2.       On January 10, 2013, the government filed a criminal Complaint against Anthony  
3 Pisarski and Sonny Lee Moore. The case was assigned to the Honorable Laurel Beeler (CR 13-70019).

4           3.       On February 26, 2013, the parties filed a Stipulation and Proposed Order to stay the civil  
5 forfeiture proceeding (CV 12-06284) until the completion of the criminal proceeding. On February 28,  
6 2013, Hon. Tigar granted the Stipulation and ordered the parties to submit a joint status report on the  
7 related criminal investigation every 60 days.

8           4.       On June 10, 2013, the government commenced an additional civil forfeiture action by  
9 filing a complaint in *United States v. One 2012 Toyota Tacoma Truck, VIN 3TMMU4FNOCM044260 et*  
10 *al.* The case was assigned to the Honorable Donna M. Ryu (CV 13-02648).

11           5.       On July 17, 2013, the government filed a Notice of Related Cases regarding (1) *United*  
12 *States v. Approximately \$169,920 in United States Currency, et al.* (CV 12-06284); (2) *United States v.*  
13 *One 2012 Toyota Tacoma Truck, VIN 3TMMU4FNOCM044260, et al.* (CV 13-02648); and (3) *United*  
14 *States v. Anthony Pisarski et al.* (CR 13-70019). On August 2, 2013, a Related Case Order was issued,  
15 and the cases were reassigned to the Honorable William H. Orrick, III.

16           6.       Plea negotiations in the related criminal case are still on-going. The parties in the  
17 criminal case have agreed to extend the time limits for a preliminary hearing. An arraignment or  
18 preliminary hearing date is currently set for September 18, 2013.

19           7.       Pursuant to the above representations, and the provisions of 18 U.S.C. §981(g)(1) and (2),  
20 the parties hereby stipulate and agree to stay this civil forfeiture proceeding until the completion of the  
21 criminal investigation, or until such earlier time as either party or this court may request that the matter  
22 be heard.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 IT IS SO STIPULATED:  
2

3 DATED: September 4, 2013

S/ Kimberly E. Hopkins  
KIMBERLY E. HOPKINS  
Assistant United States Attorney

4  
5  
6 DATED: September 4, 2013

S/ Ronald N. Richards  
RONALD N. RICHARDS  
Attorney for Claimant, Anthony Pisarski

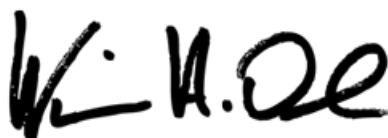
7  
8  
9 DATED: September 4, 2013

S/ T. Louis Palazzo  
T. LOUIS PALAZZO  
Attorney for Claimant, Sonny Lee Moore

10  
11 **ORDER**

12  
13 IT IS SO ORDERED on this 5th day of September, 2013 pursuant to the foregoing stipulation,  
14 that the civil forfeiture proceeding be stayed until the completion of the criminal proceeding in the  
15 United States District Court or until such earlier time as either party, or this Court, may request that the  
16 matter be heard. The parties shall submit a joint status report on the related criminal investigation within  
17 60 days of the date of this Order, and every 60 days thereafter for as long as this stay is in effect.  
18

19  
20 September 5, 2013

  
HONORABLE WILLIAM H. ORRICK, III  
United States District Judge