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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)
 17 Plaintiff,)
 18)
 19 v.)
 20)
 21 ONE 2006 CIRRUS SR20 AIRPLANE)
 22 FAA# N9255, SER. #1651 AND)
 23 APPROXIMATELY \$4,400 IN UNITED)
 24 STATES CURRENCY,)
 25)
 26 Defendants.)

No. CV 11-01724 EJD

STIPULATION TO STAY

27 Claimant Visibility Unlimited, LLC, by and through its counsel of record Brenda
 28 Grantland, and plaintiff United States of America, hereby jointly agree to a stay of the instant
 29 case.

30 The members of claimant Visibility Unlimited, LLC have a pending prosecution in Santa
 31 Clara County County Superior Court [Case No. C1093460]. An arraignment on a new
 32 indictment with the same case number is currently set for July 6, 2011. The currency at issue in
 33 this forfeiture was seized during the arrest in the Santa Clara County case, and the parties agree
 34 that allegations in the present forfeiture complaint are related to the allegations at issue in the
 35 related criminal case.


1 Claimant Visibility Unlimited, LLC contends that its members are the subject of a related
 2 criminal case, and continuation of the forfeiture proceeding will burden the right of the claimant
 3 against self-incrimination in the related criminal case. Thus, claimant Visibility Unlimited, LLC
 4 requests a stay pursuant to 18 U.S.C. § 981(g)(2). The United States independently requests a
 5 stay under 18 U.S.C. § 981(g)(1), as civil discovery would adversely affect the prosecution of the
 6 related criminal case pending in Santa Clara County. The United States, respectfully reserves the
 7 right, if necessary, to preserve the value of the defendant property by interlocutory sale, should the
 8 conditions outlined in the Supplemental Rule for Admiralty or Maritime Claims and Asset Forfeiture
 9 Actions Rule G(7)(b) occur.

10 For the aforementioned reasons, the parties respectfully request that the current case be stayed
 11 for 180 days.

13 Dated: 7-5-2011


 BREND A GRANTLAND, ESQ.
 Attorney for Claimants

16 Dated: 7-5-11


 DAVID B. COUNTRYMAN
 Assistant United States Attorney

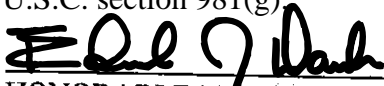
ORDER GRANTING STAY

21 UPON CONSIDERATION of the Stipulation to Stay, the entire record, and for good
 22 cause shown, it is by the Court on this 6th day of July, 2011

23 ORDERED that the instant case be, and hereby is, STAYED, until January 6
 24 20 12, at 10:00 a.m.

or until further order of the Court pursuant to
 18 U.S.C. section 981(g)

26 The Case Management Conference
 27 previously scheduled for 7/15/2011
 28 is hereby vacated and reset for
 1/6/2012, at 10:00 a.m. Joint CMC
 Statement due by 12/28/2011.


 HONORABLE EDWARD J. DAVILA
 United States District Judge

STIPULATION TO STAY
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