

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,
c/o United States Attorney's Office
555 Fourth St., N.W.,
Washington, D.C. 20530,

Plaintiff,

v.

8 GILCREASE LANE, QUINCY
FLORIDA 32351,

and,

ONE CONDO LOCATED ON
NORTH OCEAN BOULEVARD IN
MYRTLE BEACH, SOUTH
CAROLINA,

and,

ALL FUNDS, INCLUDING
APPROXIMATELY \$53 MILLION,
HELD ON DEPOSIT AT BANK OF
AMERICA ACCOUNTS IN THE NAMES
(1) THOMAS A. BOWDOIN, JR.,
SOLE PROPRIETOR, DBA
ADSURFDAILY, (2) CLARENCE
BUSBY JR. AND DAWN STOWERS,
DBA GOLDEN PANDA AD BUILDER,
AND (3) GOLDEN PANDA
AD BUILDER,

Defendants, and

GOLDEN PANDA AD BUILDER, AND
CLARENCE BUSBY, JR.

Claimants.

**UNNAPPOSED MOTION FOR
EXTENSION TO FILE
RESPONSIVE PLEADING**

Civil Action No: 1:08-cv-01345
Hon. Rosemary M. Collyer

CLAIMANT’S UNNAPPOSED MOTION FOR EXTENSION TO FILE RESPONSIVE PLEADING

Clarence Busby Jr. d/b/a Golden Panda Ad Builder (“Golden Panda”), by counsel, hereby moves this Honorable Court for a 30-day extension to file responsive pleadings. 18 U.S.C. § 983(a)(4)(B) requires that a claimant file responsive pleadings within 20 days after submitting a claim to seized property. *See also* Fed. R. Civ. Pro Supplemental Rule G(5)(b). The Government filed its complaint against Golden Panda’s property on August 5, 2008. Golden Panda timely filed its claim thereafter on August 22, 2008. *See* 18 U.S.C. § 983(a)(4)(A) (claims are timely filed within 30 days from date of complaint). Golden Panda has conferred with Government counsel concerning this motion. The Government has consented to a 30-day extension permitting Golden Panda to file its responsive pleadings by October 13, 2008.

Respectfully submitted,

CLARENCE BUSBY JR. AND GOLDEN
PANDA AD BUILDER

D. Jack Smith
Law Offices of D. Jack Smith
4620 Shady Grove Rd.,
Memphis, TN 39117
Co-Counsel

By: _____/s/_____
Jonathan W. Emord*
Andrea G. Ferrenz
Peter A. Arhangelsky
Emord & Associates, P.C.
11808 Wolf Run Lane
Clifton, VA 20124
Ph: (202) 466-6937
Fx: (202) 466-6938
Its Counsel

* Counsel of Record