

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 08-1345 (RMC)
)	
8 GILCREASE LANE, QUINCY)	
FLORIDA 32351, etc., et al.,)	
)	
Defendants.)	
_____)	ECF

**MOTION TO PERMIT GOVERNMENT TO FILE MEMORANDUM OF LAW BY
FEBRUARY 9, 2010**

COMES NOW, the United States of America, by and through the United States Attorney for the District of Columbia, to move the Court to permit the United States to file its memorandum of law in response to Mr. Bowdoin’s Rule 60 motion on or before Tuesday, February 9, 2010.

1. On January 20, 2010, Thomas A. Bowdoin, Jr., filed a motion “requesting that this Honorable Court vacate and reissue its orders of November 10, 2009 and November 16, 2009, and vacate the January 4, 2010 Order in which the Plaintiff’s Motion for Default as to Forfeiture of Remaining Defendants in rem was granted.” See Docket Entry No. 167.¹ Thereafter, on January 21, 2010, the government filed “Notice Of Plaintiff United States Government’s Position On Motion For Relief From The Judgment, etc.” See Docket Entry No. 168. In that notice, the government stated it intended “to file a memorandum of law with the Court supporting” its position that “that the Court’s rulings and issuance of a default judgment and final order of forfeiture were correct in law and fully justified by the case’s posture when the Court ruled.”

¹ Citations in this motion to “Docket Entry No. ‘X’” refer to the document filed in this case’s official Court file and recorded by that docket entry number on the Court’s electronic case file, which can be accessed through the PACER system.

2. Because of the press of other business, the government seeks to file its memorandum of law in response to Mr. Bowdoin's motion on or before February 9, 2010.

3. A proposed order granting this motion is attached. Counsel for Mr. Bowdoin, Mr. Charles A. Murray, Esq., states that his client's position on this motion is that Mr. Bowdoin has no objection to an enlargement of time requested, provided that Mr. Bowdoin is granted until February 23, 2010, to file a reply.

WHEREFORE, the government respectfully prays this Honorable Court to grant this motion and to issue the attached proposed order.

Respectfully submitted,

/s/ Barry Wiegand

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Counsel for Plaintiff United States

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused the foregoing motion and proposed order to be filed through the Court's ECF system on second day of February 2010. Further, I have transmitted this pleading by e-mail to Mr. Charles A. Murray, Esq.

/s/ Barry Wiegand

Barry Wiegand

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ORDER

This matter came before the Court on a Motion To Permit Government To File Memorandum Of Law By February 9, 2010. Upon consideration of that motion and the entire record herein, it is by the Court this ____ day of February

ORDERED, that the motion be, and the same hereby is, **GRANTED**; and it is further

ORDERED, that the government file its memorandum of law on or before February 9, 2010.

ROSEMARY M. COLLYER
UNITED STATES DISTRICT JUDGE