

**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.

**CLAIMANTS' MOTION FOR
SEVERANCE AND TRANSFER**

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

CLAIMANTS' MOTION FOR SEVERANCE AND TRANSFER

Claimant Clarence Busby Jr. d/b/a Golden Panda Ad Builder (“Golden Panda”), by counsel and pursuant to Fed. R. Civ. Pro Rule 20, 42, and 28 U.S.C. § 1404, respectfully requests that this Honorable Court sever these forfeiture proceedings in two and a simultaneous transfer forfeiture proceedings concerning Golden Panda’s assets to the United States District Court for the Northern District of Georgia. The Government has named the property of two independently owned, operated, and controlled companies, Golden Panda Ad Builder (“Golden Panda”) and Ad Surf Daily Cash Generator (“ASD”), as defendants. In its 44 page complaint, the Government devotes just two pages of text to discussion of Golden Panda. The Government has predicated its allegations against Golden Panda on the false assumption that Golden Panda was and is controlled by ASD and its owner Andy Bowdoin. To the contrary, neither ASD nor Bowdoin is affiliated with Golden Panda. Neither has control of Golden Panda accounts, supplied funding for Golden Panda, or has received any compensation from Golden Panda. In addition, neither Golden Panda nor its principals have any connection with the District of Columbia.

Golden Panda thus stands in a different position from ASD, and it would suffer prejudice if forced to defend alongside ASD in these proceedings. Therefore, Golden Panda requests severance of the case into two proceedings, and it requests simultaneous transfer of the cause of action against it to the District Court for the Northern District of Georgia, a venue appropriate and that does not impose undue burden and prejudice to Golden Panda.

In support of this motion, Golden Panda submits the attached Memorandum of Law and Authorities.

Respectfully submitted,

CLARENCE BUSBY JR. AND GOLDEN
PANDA AD BUILDER

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