## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)
Plaintiff,	) Civil No. 08-1345 (RMC)
V.	) STIPULATED MOTION FOR
8 GILCREASE LANE, QUINCY	EXTENSION OF TIME TO
FLORIDA 32351, ET AL.,	) RESPOND TO ORDER TO
	) SHOW CAUSE
Defendants.	)

## STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO ORDER TO SHOW CAUSE

Thomas A. Bowdoin, Jr. and AdSurfDaily ("ASD") (collectively, the "Claimants"), by counsel, hereby submit this motion for an extension of time beyond the present due date of August 28, 2009, until Monday, September 21, 2009, for the submission of the Claimants' response to this Court's July 24, 2009 Order to Show Cause. Counsel for the Claimants have engaged in continuing negotiations with the Government and it appears that these negotiations could result in an agreement resolving the entire matter. Good cause exists for the granting of the motion because the extension will not prejudice of the Court or the parties, may avoid the need for this Court to address the matters raised in the Order to Show Cause, and may facilitate a total resolution to these proceedings. The Government concurs in the requested extension.

Dated: August 26, 2009 Respectfully submitted,

By:

Charles A. Murray, Esq.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished via, email, fax and regular First Class U.S. Mail to William R. Cowden and Vasu B. Muthyala, Assistant United States Attorneys, Asset Forfeiture Unit, 555 4<sup>th</sup> Street N.W. Washington, DC 20530 this 26<sup>th</sup> day of August, 2009.

Charles A. Murray, Esq.

Attorney for the Claimants

Thomas A. Bowdoin, Jr. and AdSurfDaily