UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 15-13766 Honorable Robert Cleland

vs.

TWELVE THOUSAND ONE HUNDRED EIGHTY SIX DOLLARS (\$12,186.00) IN U.S. CURRENCY, et al;

Defendants in Rem.

STIPULATION AND ORDER TO STAY CIVIL FORFEITURE PROCEEDING

Plaintiff, the United States of America, by and through United States Attorney Barbara L. McQuade, and Assistant United States Attorney Paul A. Kuebler, and Claimants, Mohamad Karim Altabba, individually and as President of Behavioral Infermiera Care Solutions, Inc., by and through his attorney, David Griem, and Mamoun Dabbagh, M.D., by and through his attorney, Kristina Joseph, (collectively, "the Parties"), hereby acknowledge that there is an ongoing criminal investigation related to this civil forfeiture case, and stipulate to the entry of an order for a stay of the above-captioned civil forfeiture proceeding pursuant to 18 U.S.C. § 981(g)(1), or alternatively, 18 U.S.C. § 981(g)(2), on the grounds that continuation of the civil proceeding may negatively impact one or more Parties in

the manner described in the cited statutes; and that the stay continue for a period of

90 days from the date this order is entered, or until further order of the Court.

BARBARA L. McQUADE United States Attorney

<u>S/ PAUL A. KUEBLER</u> PAUL A. KUEBLER Assistant United States Attorney 211 W. Fort St., Ste. 2001 Detroit, MI 48226 (313) 226-9641 <u>paul.kuebler@usdoj.gov</u> (NY 4268561)

Dated: February 2, 2016

S/ DAVID GRIEM DAVID GRIEM Attorney for Claimant Mohamad Karim Altabba, individually and as President of Behavioral Infermiera Care Solutions, Inc., 21 Kercheval Ave., Suite 363 Grosse Pointe Farms, MI 48236 (313) 962-8600 davidgriemlaw@gmail.com (P23187)

Dated: February 2, 2016

S/ KRISTINA JOSEPH

KRISTINA JOSEPH Attorney for Claimant Mamoun Dabbagh, M.D. 21 Kercheval Ave., Suite 363 Grosse Pointe Farms, MI 48236 (313) 962-8600 Kjoseph.griemlaw@gmail.com (P79668)

Dated: February 2, 2016

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ORDER TO STAY CIVIL FORFEITURE PROCEEDING

This matter having come before the Court on the Government and

Claimants' stipulation, and the Court being fully advised in the premises;

IT IS HERBY ORDERED that this case shall be stayed for a period of 90

days from the date this order is entered, or until further order of the Court.

<u>s/Robert H. Cleland</u> HONORABLE ROBERT CLELAND United States District Court

Dated: February 4, 2016