UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 18-cv-11307

vs.

Honorable: Victoria A. Roberts

Nineteen Thousand Three Hundred Fifteen Dollars and Eighteen Cents (\$19,315.18) in U.S. Currency from Bank of America Account Number: 237033591854

Defendant In Rem.

STIPULATION FOR ENTRY OF ORDER STAYING PROCEEDING FOR A PERIOD OF 90 DAYS

NOW COMES the Plaintiff, the United States of America, by and through Matthew Schneider, United States Attorney, and Philip A. Ross, Assistant United States Attorney, and Claimant, E.L. Mann, Inc., by and through its attorney, John D. Dakmak, Esq., hereby acknowledge that there is an ongoing criminal investigation related to the above-captioned civil forfeiture case, and stipulate as follows:

IT IS HEREBY STIPULATED AND AGREED that this civil forfeiture

case be stayed for a period of 90 days 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 all parties in the manner described in the cited statutes; that the stay continue during the pendency of the investigation and criminal proceedings, if any, or until further order of the Court without prejudice to any of the parties to seek an advance termination or an extension of the stay;

IT IS FURTHER STIPULATED AND AGREED that the parties shall

have a reasonable time to conduct discovery, file dispositive motions, and file all witness lists prior to any pretrial or trial proceedings. No claims or defenses are waived as a result of the stay.

IT IS FURTHER STIPULATED AND AGREED that upon termination

of the stay, the Court will set a scheduling conference.

Approved as to substance and form:

Respectfully submitted,

Matthew Schneider United States Attorney

s/Philip A. Ross Philip A. Ross Assistant United States Attorney 211 W. Fort Street, Ste. 2001 Detroit, MI 48226 Phone: (313) 226-9790 e-mail: <u>Philip.Ross@usdoj.gov</u> Va. State Bar #70269

Dated: June 14, 2018

<u>s/John D. Dakmak (with consent)</u> John D. Dakmak Counsel for Claimant 500 Woodward Ave., Ste. 3500 Detroit, MI 48226 Phone: (313) 965-8300 e-mail: jdakmak@clarkhill.com (P58210)

Dated: June 14, 2018

IT IS SO ORDERED:

<u>S/Victoria A. Roberts</u> Victoria A. Roberts United States District Judge

Dated: June 15, 2018