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6  
 7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

2:10-CV-0561-JCM (PAL)

12 \$3,306.77 IN UNITED STATES CURRENCY,

13 Defendant.

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

2:10-CV-0562-JCM (PAL)

17 \$613.23 IN UNITED STATES CURRENCY,

18 Defendant.

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

2:10-CV-0563-JCM (PAL)

22 \$6,516.34 IN UNITED STATES CURRENCY,

23 Defendant.

24 UNITED STATES OF AMERICA,

25 Plaintiff,

26 v.

2:10-CV-0564-JCM (PAL)

\$13,064.93 IN UNITED STATES CURRENCY,

Defendant.

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2 **THE UNITED STATES OF AMERICA'S UNOPPOSED MOTION**  
3 **TO STAY THE CIVIL ACTIONS**

4 The United States of America, by and through Daniel G. Bogden, United States Attorney, and  
5 Drew Smith, Assistant United States Attorney, hereby moves this Court to stay the above-captioned  
6 civil forfeiture actions pursuant to 18 U.S.C. § 981(g)(1) and (g)(2) until the completion of the related  
7 criminal case, *United States v. Sharon Chow*, 2:10-CR-0158-JCM (PAL).

8 The United States, Sharon Chow, and her counsel, Christopher R. Oram, agree that civil  
9 discovery in this matter would adversely affect the United States, Sharon Chow, and her counsel,  
10 Christopher R. Oram, in conducting the related criminal case.

11 On June 24, 2010, Christopher R. Oram, counsel for Sharon Chow, did not oppose, and  
12 agreed to, this Unopposed Motion.

13 This Unopposed Motion is not submitted solely for the purpose of delay or for any other  
14 improper purpose.

15 Respectfully submitted this 24th day of June, 2010.

16 DANIEL G. BOGDEN  
17 United States Attorney

18 /s/ Drew Smith  
19 DREW SMITH  
20 Assistant United States Attorney

21 IT IS SO ORDERED:

22  
23 James C. Mahan  
24 UNITED STATES DISTRICT JUDGE  
25 DATED: July 1, 2010  
26

1 **PROOF OF SERVICE**

2 I, Jacqueline L. Peltier, certify that the following individual was served with a copy of the  
3 United States of America's Unopposed Motion to Stay the Civil Actions on June 24, 2010, by the  
4 below identified method of service:

5 E-mail/ECF

6 Christopher R. Oram  
7 520 South Fourth Street, Second Floor  
8 Las Vegas, NV 89101  
9 crorambusiness@aol.com  
10 Counsel for Sharon Chow

11 /s/ Jacqueline L. Peltier  
12 JACQUELINE L. PELTIER  
13 Paralegal Specialist  
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