

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 14-294-PB
)	
Six Hundred Ninety Five Dollars (\$695.00) in)	
U.S. Currency, more or less, seized from Phat)	
Stuff, Keene, New Hampshire; et al,)	
)	
Defendants <i>in rem</i>)	
_____)	

NOTICE OF OBJECTION

NOW COMES Katie Eliopoulos, (the “Claimant”), by and through counsel, Wilson, Bush, Durkin & Keefe, P.C., and hereby files this Notice of Objection.

1. On October 9, 2014, the Defendant filed a motion to stay these proceedings;
2. Through oversight, accident, or misfortune, counsel neglected to obtain the position of Ford Motor Credit Company (“Ford”), another party to this action, on the Defendant’s motion to stay;
3. Ford objects to said motion;
4. However, the Defendant and Ford hope to resolve the underlying issue in the coming days that prevents Ford from giving its assent.
5. Should such resolution occur, the parties will inform the Court of Ford’s position on said motion to stay.

WHEREFORE, the Claimant moves that this court stay all proceedings pending the resolution of the case in the United States District Court.

Respectfully submitted,

Dated: October 13, 2014

Katie Eliopoulos

By her attorneys,
Wilson, Bush, Durkin & Keefe, P.C.

By: /s/ Charles J. Keefe

Charles J. Keefe, NH Bar #14209

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on this date upon AUSA Robert Rabuck, Attorney for the United States, as well as Thomas E. Walker, Jr., Esq., as designated under the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, via ECF filing at:

Rob Rabuck, Esq.

Thomas E. Walker, Esq.

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/s/ Charles Keefe

Charles Keefe