

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

UNITED STATES OF AMERICA,

Plaintiff

V.

**Six Hundred Ninety Five Dollars (\$695.00) in
U.S. Currency, more or less, seized from Phat
Stuff, Keene, New Hampshire; et al,**

Defendants *in rem*

Case No. 14-294-PB

ASSENTED TO MOTION TO EXTEND TIME

NOW COMES, Ford Motor Credit ("Claimant"), and pursuant to Rule 6(b)(1)(a) and LBR 7.2(a), states as follows:

- 1) Plaintiff filed its Complaint herein on or about July 3, 2014.
- 2) Plaintiff served Claimant with the Complaint via Certified Mail on or about July 29, 2014, establishing the deadline for Claimant to file a claim on or before August 22, 2014.
- 3) Upon receiving the Complaint, Claimant conducted internal research and review and determined that local counsel would need to be retained in order to assert the Claimant's interests in this matter. Although local counsel was retained prior to the deadline to file a Claim and Answer, it is unable to file the necessary documents prior to the established deadline.
- 4) In light of the above, Claimant is filing this motion seeking to extend the time to file its Claim and Answer to September 5, 2014.
- 5) Claimant's counsel has conferred with Plaintiff's counsel and obtained his assent to the granting of this motion.
- 6) The granting of this motion will not result in the continuance of any hearing, conference or trial.

WHEREFORE, for the reasons stated herein, Ford Motor Credit requests that this Court extend the deadline in which to file its Claim and Answer.

Respectfully submitted,

/s/Jay M. Niederman

FORD MOTOR COMPANY
By Jay M. Niederman
NH Bar Number: 1874
Niederman, Stanzel & Lindsey
55 West Webster Street
Manchester, NH 03104
(603) 668-5960

CERTIFICATE OF SERVICE

I hereby certify that this Assented to Motion to Extend Time was served on the following persons on this date and in the manner specified herein:

Electronically Served Through ECF: Rob Rabuck, AUSA

Date: August 22, 2014

/s/ Jay M. Niederman