

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,		)
		)
Plaintiff,		)
		)
v.		)
	Case: 1:08-cv-01345	)
		)
8 GILCREASE LANE, QUINCY		)
FLORIDA 32351,		)
	Hon. Rosemary M. Collyer	)
		)
and		)
		)
ONE CONDO LOCATED ON		)
NORTH OCEAN BOULEVARD IN		)
MYRTLE BEACH, SOUTH		)
CAROLINA,		)
		)
and		)
		)
ALL FUNDS, INCLUDING		)
APPROXIMATELY \$53 MILLION,		)
HELD ON DEPOSIT AT BANK OF		)
AMERICA ACCOUNTS IN THE NAMES		)
OF (1) THOMAS A. BOWDOIN, JR.,		)
SOLE PROPRIETOR, DBA		)
ADSURFDAILY, (2) CLARENCE		)
BUSBY, JR. AND DAWN STOWERS,		)
DBA GOLDEN PANDA AD BUILDER,		)
AND (3) GOLDEN PANDA AD BUILDER,		)
		)
Defendants, and		)
		)
ADSURFDAILY, INC., THOMAS A.		)
BOWDOIN, JR., AND BOWDOIN HARRIS		)
ENTERPRISES, INC.,		)
		)
Claimants.		)
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**MOTION FOR LEAVE TO WITHDRAW CLAIMS**  
**RELEASE OF CLAIMS TO SEIZED PROPERTY**  
**AND CONSENT TO FORFEITURE**

Claimants, AdSurfDaily, Inc., Thomas A. Bowdoin, Jr. and Bowdoin & Harris Enterprises, Inc. (hereinafter "Claimants"), by undersigned counsel, hereby request leave of the Court to withdraw and release claims previously filed, consent to forfeiture, as follows.

1. Claimants withdraw and release with prejudice the verified claims they filed in this civil forfeiture action.

2. Claimants consent to the forfeiture of the properties for which they have asserted claims (i.e., the real property at 8 Gilcrease Lane and the bank account balances at the Bank of America in the names of Thomas A. Bowdoin Jr., sole proprietor, d/b/a AdSurfDaily) and expressly announce their intention to not contest the Government's forfeiture efforts against the properties for which they have asserted claims.

Wherefore, counsel respectfully requests that the attached order be granted.

Respectfully submitted,

**AKERMAN SENTERFITT**

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and

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<sup>1</sup> Mr. Goodman has been permitted to appear *pro hac vice*.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of January, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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and Clarence Busby, Jr.)

s/Michael L. Fayad

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Hon. Rosemary M. Collyer

**PROPOSED ORDER**

ORDERED, this \_\_\_\_\_ day of January, 2009, that Claimants in this matter be permitted to withdraw claims with prejudice; and it is

FURTHER ORDERED that said claims are withdrawn.

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U.S. District Judge Rosemary M. Collyer

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