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9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA
 11 WESTERN DIVISION

12 United States of America,	}	No. 2:08-cv-07805-JHN -FFMx
13 Plaintiff,		Stipulated Judgment
14 vs.		
15 Robert J. Reed, et al.,		
16 Defendants.		

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19 Based upon the Stipulation for Entry of Judgment filed by the parties
20 concurrently herewith, and good cause appearing,

21 It is hereby **ORDERED, ADJUDGED, AND DECREED** that judgment be
22 entered for Plaintiff against Defendant Robert J. Reed on Count I of the Complaint
23 in this case, filed on November 25, 2008, in the amount of \$177,206.78 plus
24 statutory additions thereto, including interest under the provisions of the Internal
25 Revenue Code (Title 26, U.S.C.) accruing on such amount after March 1, 2010,
26 until judgment is paid in full.

27 **IT IS FURTHER ORDERED** that as to Count I, Defendant reserves the right to
28 appeal the issue of his willfulness under 26 U.S.C. § 6672 based upon his

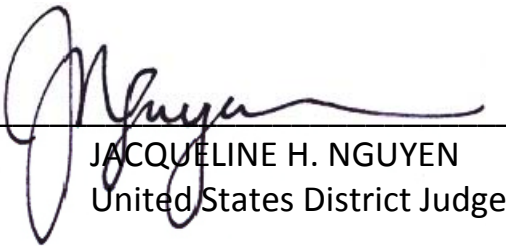
1 argument that he should be excused from liability for the Trust Fund Recovery
2 Penalty for the periods ending March 31, 2002, June 30, 2002, and September 30,
3 2002, based on the assertions that he had reasonable cause for not paying over to
4 the United States the income taxes and FICA taxes withheld from Stitches, Inc.'s
5 employees' wages during those periods, or his conduct was not "willful" under
6 the facts and circumstances of this case for failing to pay over to the United States
7 the income taxes and FICA taxes withheld from Stitches, Inc.'s employees' wages
8 during those periods.

9 **IT IS FURTHER ORDERED** that Count II of the Complaint is DISMISSED as
10 moot, because the real property located at 11372 Dona Lisa Drive, Studio City,
11 California, has been sold in a private sale.

12 **IT IS FURTHER ORDERED** that the United States and Robert Reed will each
13 bear their own costs and attorney's fees in this matter.

14 **IT IS SO ORDERED.**

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16 DATED: June 09, 2010

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18 JACQUELINE H. NGUYEN
19 United States District Judge
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