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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
\$378,143.00 IN U.S. CURRENCY,
Defendant.
WASFI ADEL ABBASSI,
Claimant.

Case No. 5:17-CV-01159-PSG(KKx)
~~[PROPOSED]~~ ORDER TO DISMISS ACTION
PURSUANT TO FED. R. CIV. P. 41(a)(2)

Pursuant to the stipulation of Plaintiff United States of America and Claimant Wasfi Adel Abbassi ("Claimant"), and good cause appearing therefor, IT IS HEREBY ORDERED that:

1. This action is dismissed pursuant to Fed. R. Civ. P. 41(a)(2).
2. Claimant hereby releases the United States of America, its agencies, agents, officers, employees and representatives, including, without limitation, all agents, officers, employees and representatives of the Bureau of Alcohol, Tobacco, Firearms and

1 Explosives and their respective agencies, as well as all agents,
2 officers, employees and representatives of any state or local
3 governmental or law enforcement agency involved in the investigation
4 or prosecution of this matter, from any and all claims (including,
5 without limitation any petitions for remission, which Claimant hereby
6 withdraws), actions or liabilities arising out of or related to this
7 action, including, without limitation, any claim for attorney fees,
8 costs and interest, which may be asserted by or on behalf of
9 Claimant, whether pursuant to 28 U.S.C. § 2465 or otherwise.

10 3. The Court finds that there was reasonable cause for the
11 institution of these proceedings, and this Order shall be construed
12 as a certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

13 4. Each of the parties hereto shall bear their own attorney
14 fees and costs.

15 Dated: 11/16/2020


16 THE HONORABLE PHILIP S. GUTIERREZ
17 UNITED STATES DISTRICT JUDGE

18 Presented By:

19 NICOLA T. HANNA
20 United States Attorney
21 BRANDON D. FOX
22 Assistant United States Attorney
23 Chief, Criminal Division
24 STEVEN R. WELK
25 Assistant United States Attorney
26 Chief, Asset Forfeiture Section

27 /s/ Victor A. Rodgers
28 VICTOR A. RODGERS
Assistant United States Attorney
Asset Forfeiture Section

Attorneys for Plaintiff
UNITED STATES OF AMERICA