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8 Attorneys for Plaintiff

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10 11 IN THE UNITED STATES DISTRICT COURT

12 13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 15 16 17 18  
19 UNITED STATES OF AMERICA, ) 2:08-CV-02075-JAM-GGH  
20 Plaintiff, ) STIPULATION FOR DISMISSAL  
21 v. ) WITH PREJUDICE AND ORDER  
22 ) CERTIFICATE OF  
23 ) REASONABLE CAUSE  
24 REAL PROPERTY LOCATED AT 6525 )  
25 SOUTH BRUCE STREET, LAS VEGAS, )  
26 NEVADA, CLARK COUNTY, )  
27 APN: 177-02-510-005, INCLUDING ALL )  
28 APPURTEANCES AND IMPROVEMENTS )  
THERETO, )  
Defendant. )  
\_\_\_\_\_  
)

19 It is hereby stipulated by and between plaintiff United States  
20 of America, claimants G&R Empire LLC; Raed "Roy" Mouri and Loudy Egho,  
21 as Trustees of the MGM Trust dated May 16, 2005; and George Bittar and  
22 Wanda Bittar, as trustees of the Bittar Family Trust, dated December  
23, 2003, and Lien Assignee National Loan Acquisitions Company, by and  
24 through their respective counsel of record, as follows:

25 1. The pending action shall be dismissed with prejudice pursuant  
26 to Rule 41(a)(2) of the Federal Rules of Civil Procedure.

27 2. The parties are to bear their own costs and attorney fees.

28 3. There was probable cause for the posting of the defendant

1 real property, and for the commencement and prosecution of this  
2 forfeiture action, and the Court may enter a Certificate of Reasonable  
3 Cause pursuant to 28 U.S.C. § 2465.

4 DATED: 5/5/11 BENJAMIN B. WAGNER  
5 United States Attorney

6 By: /s/ Kelli L. Taylor  
7 KELLI L. TAYLOR  
8 Assistant U.S. Attorney

9  
10 Dated: May 5, 2011 By: /s/ Jeffrey B. Setness  
11 JEFFREY B. SETNESS  
12 Mayall, Hurley, Knutsen, Smith & Green  
13 Attorneys for G&R Empire LLC; Raed "Roy"  
14 Mouri and Loudy Egho, as Trustees of the MGM  
15 Trust dated May 16, 2005; George Bittar and  
16 Wanda Bittar, as trustees of the Bittar  
17 Family Trust, dated December 23, 2003

18  
19 Dated: 4/21/2011 LITCHFIELD CAVO LLP

20  
21 By: /s/Edward C. Hsu  
22 Edward D. Vaisbort  
23 Richard D. Hoang  
24 Edward C. Hsu  
25 Attorneys for Lien Assignee National  
26 Loan Acquisitions Company

27 (Original signatures retained by attorney)

28 IT IS SO ORDERED.

29  
30 DATED: 5/5/2011 /s/ John A. Mendez  
31 JOHN A. MENDEZ  
32 United States District Court

33  
34 CERTIFICATE OF REASONABLE CAUSE

35 Based upon the allegations set forth in the Complaint for  
36 Forfeiture *In Rem* filed September 4, 2008, and the Stipulation for  
37 Dismissal With Prejudice filed herewith, the Court enters this

1 Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465, that  
2 there was reasonable cause for the posting of the defendant real  
3 property, and for the commencement and prosecution of this  
4 forfeiture action.

5 DATED: 5/5/2011

/s/ John A. Mendez

JOHN A. MENDEZ

United States District Court

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