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10
11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 APPROXIMATELY \$164,020.00 IN U.S.
18 CURRENCY,

19 Defendant.

20 2:14-CV-00400-JAM-DAD

21 STIPULATION AND ORDER FOR
22 DISMISSAL WITH PREJUDICE;
23 CERTIFICATE OF REASONABLE
24 CAUSE

25 It is hereby stipulated by and between the United States of America and claimants Brian
26 Corry Robinson and Kimberly Santiago-Robinson (collectively “Claimants”), by and through their
respective counsel of record (the “Stipulation”), as follows:

27 1. The defendant approximately \$164,020.00 in U.S. Currency (“defendant currency”) is
28 the only named defendant in the above entitled action.

29 2. The only parties who have filed claims in this action are Brian Corry Robinson and
30 Kimberly Santiago-Robinson.

31 3. The parties to this Stipulation agree that defendant Antelope Property shall be
32 dismissed with prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure.

33 4. The parties are to bear their own costs and attorney fees.

34 5. For purposes of effectuating this stipulation and dismissal, the parties do not contest

1 there was probable cause for the commencement of this forfeiture action, and the Court may enter a
2 Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465.

3 6. The United States shall take all reasonable steps to return the defendant currency to
4 the claimants within thirty days after the date of entry of this Order.

6 Dated: 12/23/2014

BENJAMIN B. WAGNER
United States Attorney

By: /s/ _____
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 12/23/2014

/s/
DAVID M. MICHAEL
Attorney for Claimants

IT IS SO ORDERED.

CERTIFICATE OF REASONABLE CAUSE

Based upon the allegations set forth in the Complaint for Forfeiture *In Rem* filed December 20, 2010, and the Stipulation for Dismissal With Prejudice filed herewith, the Court enters this Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465, that there was reasonable cause for the commencement of this forfeiture action.

Dated: 12/30/2014

/s/ John A. Mendez
JOHN A. MENDEZ
United States District Court Judge