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5 Attorneys for Non-Party Lienholder,
 Cavalier Asset Group, LLC

6 **IN THE UNITED STATES DISTRICT COURT**
 7 **EASTERN DISTRICT OF CALIFORNIA**

Geraci Law Firm
 90 Discovery
 Irvine, California 92618
 T: (949) 379-2600; F: (949) 379-2610

9 UNITED STATES OF AMERICA,
 10
 11 Plaintiff,

12 vs.

13 REAL PROPERTY LOCATED AT
 8911 HIGHWAY 49, MOKELUMNE
 14 HILL, CALIFORNIA, CALAVERAS
 COUNTY, APN: 018-019-157-000,
 15 INCLUDING ALL APPURTENANCES
 AND IMPROVEMENTS THERETO,

16 REAL PROPERTY LOCATED AT
 3788 DUNN ROAD, VALLEY
 17 SPRINGS, CALIFORNIA,
 CALAVERAS COUNTY, APN: 072-
 18 033-018-000, INCLUDING ALL
 APPURTENANCES AND
 19 IMPROVEMENTS THERETO,

20 REAL PROPERTY LOCATED AT
 3650 DELIN WAY, VALLEY
 21 SPRINGS, CALIFORNIA,

Case No. 2:18-CV-00747-KJM-CKD

**STIPULATION AND
 WITHDRAWAL OF VERIFIED
 CLAIM AND ANSWER OF
 LIENHOLDER, CAVALIER ASSET
 GROUP, LLC**

Complaint Filed: April 3, 2018
 Trial Date: None Set

1 CALAVERAS COUNTY, APN: 072-
2 027-005-000, INCLUDING ALL
3 APPURTENANCES AND
4 IMPROVEMENTS THERETO,

5 REAL PROPERTY LOCATED AT
6 11635 MILTON ROAD, VALLEY
7 SPRINGS, CALIFORNIA,
8 CALAVERAS COUNTY, APN: 070-
9 035-037-000, INCLUDING ALL
10 APPURTENANCES AND
11 IMPROVEMENTS THERETO,

12 REAL PROPERTY LOCATED AT
13 6365 HIRONYMOUS WAY, VALLEY
14 SPRINGS, CALIFORNIA,
15 CALAVERAS COUNTY, APN: 073-
16 015-002-000, INCLUDING ALL
17 APPURTENANCES AND
18 IMPROVEMENTS THERETO,

19 REAL PROPERTY LOCATED AT
20 8914 GREER WAY, VALLEY
21 SPRINGS, CALIFORNIA,
CALAVERAS COUNTY, APN: 070-
039-018-000, INCLUDING ALL
APPURTENANCES AND
IMPROVEMENTS THERETO,

REAL PROPERTY LOCATED AT
8786 GREER WAY, VALLEY
SPRINGS, CALIFORNIA,
CALAVERAS COUNTY, APN: 070-
039-014-000, INCLUDING ALL
APPURTENANCES AND
IMPROVEMENTS THERETO,

REAL PROPERTY LOCATED AT
8456 BALDWIN STREET, VALLEY
SPRINGS, CALIFORNIA,
CALAVERAS COUNTY, APN: 070-

1 035-014-000, INCLUDING ALL
2 APPURTENANCES AND
3 IMPROVEMENTS THERETO,
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5 REAL PROPERTY LOCATED AT
6 6199 HIGHWAY 26, VALLEY
7 SPRINGS, CALIFORNIA,
8 CALAVERAS COUNTY, APN: 073-
9 013-005-000, INCLUDING ALL
10 APPURTENANCES AND
11 IMPROVEMENTS THERETO,
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13 REAL PROPERTY LOCATED AT
14 6048 AMOS LANE, VALLEY
15 SPRINGS, CALIFORNIA,
16 CALAVERAS COUNTY, APN: 048-
17 025-287-000, INCLUDING ALL
18 APPURTENANCES AND
19 IMPROVEMENTS THERETO,
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21 REAL PROPERTY LOCATED AT
22 2852 HOFFMAN DRIVE, VALLEY
23 SPRINGS, CALIFORNIA,
24 CALAVERAS COUNTY, APN: 072-
25 018-014-000, INCLUDING ALL
26 APPURTENANCES AND
27 IMPROVEMENTS THERETO, and
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29 REAL PROPERTY LOCATED AT
30 2838 HOFFMAN DRIVE, VALLEY
31 SPRINGS, CALIFORNIA,
32 CALAVERAS COUNTY, APN: 072-
33 018-015-000, INCLUDING ALL
34 APPURTENANCES AND
35 IMPROVEMENTS THERETO,

Defendants.

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1 **IT IS HEREBY STIPULATED** by and between claimant, Cavalier Asset
2 Group, LLC (“Claimant”), by and through its undersigned counsel, Larissa A.
3 Branes, Esq. of Geraci Law Firm, and Plaintiff, the United States of America
4 (“Plaintiff”), by and through its undersigned counsel, Kevin C. Khasigian, Assistant
5 United States Attorney, as follows:

6 1. Claimant asserted a lienholder interest in the defendant property located
7 at 3788 Dunn Rd., Valley Springs, California 95252 (“Defendant Dunn Rd.”), which
8 maintains the following legal description:

9 Real Property in the unincorporated area of the County of Calaveras,
10 State of California, described as follows:

11 LOT NO. 2307 AS SAID LOT IS SHOWN ON THAT CERTAIN
12 MAP ENTITLED “RANCHO CALAVERAS, TRACT NO. 179,
13 UNITS 8 AND 9” FILED FOR RECORD NOVEMBER 20, 1967 IN
14 BOOK 3 OF MAPS, PAGE 11 IN THE OFFICE OF THE COUNTY
15 RECORDER OF CALAVERAS COUNTY, CALIFORNIA.

16 APN: 072-033-018;

17 2. The loan has since been satisfied and Claimant no longer has an interest
18 in Defendant Dunn Rd.;

19 3. Accordingly, Claimant hereby withdraws its claim filed in the above-
20 captioned case on June 15, 2018 [Dk. 38] and its answer filed in the above-captioned
21 case on July 19, 2018 [Dk. 62] with respect to the Defendant Dunn Rd.;

1 4. To the extent required under the *Federal Rules of Civil Procedure*, Rule
2 41(a), Plaintiff agrees to dismiss with prejudice Claimant in the above-captioned
3 case pursuant to the *Federal Rules of Civil Procedure*, Rule 41(a). Defendant Dunn
4 Rd. is the *in rem* defendant.

5 5. Each party hereto is to bear its own costs; and

6 6. Claimant is hereby removed from the Service List for the above-
7 captioned case.

8

9 Date: March 5, 2019

GERACI LAW FIRM

10

By: /s/ Larissa A. Branes
Larissa A. Branes, Esq.
Amy E. Martinez, Esq.
Alexa P. Stephenson, Esq.
Attorneys for Non-Party Lienholder,
Cavalier Asset Group, LLC

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Date: March 5, 2019

MCGREGOR W. SCOTT

United States Attorney

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By: /s/ Kevin C. Khasigian
Kevin C. Khasigian
Assistant United States Attorney

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ORDER

The Court has read and considered the Stipulation of Withdrawal of Claim and Answer by Cavalier Asset Group, LLC (“the Stipulation”) by Claimant, Cavalier Asset Group, LLC (“Claimant”), and Plaintiff, United States of America (“Plaintiff”), by and through their respective counsel (collectively, the “Parties”).

For the reasons stated in the Stipulation and for good cause shown,

IT IS HEREBY ORDERED as follows:

1. The Stipulation is approved.
2. Claimant’s claim filed in the above-captioned case on June 15, 2018 [Dk. 38] is hereby deemed withdrawn.
3. Claimant’s answer filed in the above-captioned case on July 19, 2018 [Dk. 62] is hereby deemed withdrawn.
4. Claimant is hereby deemed dismissed from the above-captioned case.

IT IS SO ORDERED.

DATED: March 5, 2019.


UNITED STATES DISTRICT JUDGE