

1 McGREGOR W. SCOTT
 United States Attorney
 2 KEVIN C. KHASIGIAN
 Assistant U. S. Attorney
 3 501 I Street, Suite 10-100
 Sacramento, CA 95814
 4 Telephone: (916) 554-2700
 5 Attorneys for the United States

6
 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 UNITED STATES OF AMERICA
 12 Plaintiff,
 13 v.
 14 REAL PROPERTY LOCATED AT 8911
 15 HIGHWAY 49, MOKELUMNE HILL,
 16 CALIFORNIA, CALAVERAS COUNTY, APN:
 018-019-057-000, INCLUDING ALL
 17 APPURTENANCES AND IMPROVEMENTS
 THERE TO, ET AL.,
 18 Defendants.

2:18-CV-00747-KJM-CKD

STIPULATION AND ORDER FOR
 DISMISSAL WITH PREJUDICE OF REAL
 PROPERTY; CERTIFICATE OF
 REASONABLE CAUSE

19 It is hereby stipulated by and between the United States of America and claimants Anne
 20 Freeman, Trustee, and Xiuzhu Yang, by and through their respective counsel of record, as follows:

21 1. The pending action against only the real property located at 8914 Greer Way, Valley
 22 Springs, California, Calaveras County, APN: 070-039-018-000, shall be dismissed with prejudice
 23 pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure.

24 2. The real property located at 8914 Greer Way, Valley Springs, California, sold for
 25 \$285,748.06 at a Trustee’s Sale on November 20, 2018. Claimant Anne Freeman’s outstanding lien
 26 was paid in full from the proceeds of the sale. There were no additional proceeds from the sale of the
 27 property.

1 3. The parties are to bear their own costs and attorney fees.

2 4. There was probable cause for the posting of the defendant real property, and for the
3 commencement and prosecution of this forfeiture action, and the Court may enter a Certificate of
4 Reasonable Cause pursuant to 28 U.S.C. § 2465.

5 Dated: 10/22/2019

McGREGOR W. SCOTT
United States Attorney

7 By /s/ Kevin C. Khasigian
8 KEVIN C. KHASIGIAN
9 Assistant U.S. Attorney

10 Dated: 8/7/2019

/s/ Edward T. Weber
EDWARD T. WEBER
Attorney for Claimant Anne Freeman

13 Dated: 10/22/2019


/s/ Linda M. Parisi
LINDA M. PARISI
Attorney for Claimant Xiuzhu Yang

16 CERTIFICATE OF REASONABLE CAUSE

17 Based upon the allegations set forth in the Complaint for Forfeiture *In Rem* filed April 3, 2018,
18 and the Stipulation for Dismissal With Prejudice filed herewith, the Court enters this Certificate of
19 Reasonable Cause pursuant to 28 U.S.C. § 2465, that there was reasonable cause for the posting of the
20 defendant real property located at 8914 Greer Way, Valley Springs, California, Calaveras County,
21 APN: 070-039-018-000, and for the commencement and prosecution of this forfeiture action.

22 IT IS SO ORDERED.

23 DATED: October 29, 2019.

24 
25 UNITED STATES DISTRICT JUDGE