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6	Attorneys for Bruce J. Warren, Trustee	
7	of the Bruce J. Warren 2002 Revocable Trust	
8	UNITED STATES D	ISTRICT COURT
9	EASTERN DISTRICT	OF CALIFORNIA
10	UNITED STATES OF AMERICA,	No. 2:18-cv-00763-KJM-CKD
11	Plaintiff,	
12	v.	STIPULATION AND WITHDRAWAL OF
13	REAL PROPERTY LOCATED AT 10170	VERIFIED CLAIM AND ANSWER OF LIENHOLDER, BRUCE J. WARREN,
14	PATTI WAY, ELK GROVE, CALIFORNIA, SACRAMENTO COUNTY, APN: 132-0910-	TRUSTEE OF THE BRUCE
15	069-0000, INCLUDING ALL APPURTENANCES AND IMPROVEMENTS	J. WARREN 2002 REVOCABLE TRUST
16	THERETO,	
17	REAL PROPERTY LOCATED AT 4960	Complaint Filed: April 4, 2018
18	FRANCESA STREET, ELK GROVE, CALIFORNIA, SACRAMENTO COUNTY,	Trial Date: None
19	APN: 117-1000-033-0000, INCLUDING ALL APPURTENANCES AND IMPROVEMENTS	
20	THERETO,	
21	REAL PROPERTY LOCATED AT 19460	
22	FIDDLETOWN ROAD, FIDDLETOWN, CALIFORNIA, AMADOR COUNTY, APN:	
23	021-050-019-000, INCLUDING ALL APPURTENANCES AND IMPROVEMENTS	
24	THERETO,	
25	REAL PROPERTY LOCATED AT 9009	
26	FERNWAY COURT, ELK GROVE, CALIFORNIA, SACRAMENTO COUNTY,	
27	APN: 116-1290-019-0000, INCLUDING ALL	
28	APPURTENANCES AND IMPROVEMENTS THERETO,	

1	REAL PROPERTY LOCATED AT 8885	
2	MONTEREY OAKS DRIVE, ELK GROVE, CALIFORNIA, SACRAMENTO COUNTY,	
3	APN: 116-1270-018-0000, INCLUDING ALL APPURTENANCES AND IMPROVEMENTS	
4	THERETO,	
5	REAL PROPERTY LOCATED AT 16481	
6	FIDDLETOWN ROAD, FIDDLETOWN, CALIFORNIA, AMADOR COUNTY, APN:	
7	014-270-026-000, INCLUDING ALL APPURTENANCES AND IMPROVEMENTS	
8	THERETO,	
9	REAL PROPERTY LOCATED AT 25 DONSON COURT, ELK GROVE,	
10	CALIFORNIA, SACRAMENTO COUNTY, APN: 117-1510-050-0000, INCLUDING ALL	
11	APPURTENANCES AND IMPROVEMENTS	
12	THERETO,	
13	REAL PROPERTY LOCATED AT 7627 MASTERS STREET, ELK GROVE,	
14	CALIFORNIA, SACRAMENTO COUNTY, APN: 117-1390-017-0000. INCLUDING ALL	
15	APPURTENANCES AND IMPROVEMENTS THERETO,	
16	REAL PROPERTY LOCATED AT 8620	
17	PORT WAYWARD WAY, SACRAMENTO,	
18	CALIFORNIA, SACRAMENTO COUNTY, APN: 117-0970-086-0000, INCLUDING ALL	
19	APPURTENANCES AND IMPROVEMENTS THERETO,	
20	Defendants.	
21		
22	IT IS HEREBY STIPULATED by and between claimant, Bruce J. Warren, Trustee of	
23	the Bruce J. Warren 2002 Revocable Trust ("Claimant"), by and through his undersigned counsel,	
24	Russell W. Reynolds of Coleman & Horowitt, LLP, and Plaintiff, the United States of America	
25	("Plaintiff"), by and through its undersigned counsel, Kevin C. Khasigian, Assistant U.S.	
26	Attorney, as follows:	
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1	1. Claimant asserted a lienholder interest in the defendant property located at 19460	
2	Fiddletown Road, Fiddletown, California, APN: 021-050-019-000.	
3	2. Claimant asserted a lienholder interest in the defendant property located at 16481	
4	Fiddletown Road, Fiddletown, California, APN: 014-270-026.	
5	3. The loans have since been satisfied and Claimant no longer has an interest in the	
6	defendant 19460 Fiddletown Road and 16481 Fiddletown Road properties.	
7	4. Accordingly, Claimant hereby withdraws its claims filed in the above-captioned	
8	case on May 31, 2018, with respect to the 19460 Fiddletown Road and 16481 Fiddletown Road	
9	properties [Dk. 12], and its answer filed in the above-captioned case on May 31, 2018 [Dk. 11].	
10	5. To the extent required under the <i>Federal Rules of Civil Procedure</i> , Rule 41(a),	
11	Plaintiff agrees to dismiss with prejudice Claimant in the above-captioned case pursuant to the	
12	Federal Rules of Civil Procedure, Rule 41(a). Defendant Real Property Located at 19460	
13	Fiddletown Road, Fiddletown, California and Defendant Real Property Located at 16481	
14	Fiddletown Road, Fiddletown, California are the in rem Defendants.	
15	6. Each party hereto is to bear its own costs; and	
16	7. Claimant is hereby removed from the Service List for the above-captioned case.	
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18	COLEMAN & HOROWITT, LLP	
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20	Dated: May 29, 2019. By: /s/ Russell W. Reynolds RUSSELL W. REYNOLDS	
21	Attorneys for Bruce J. Warren, Trustee of the	
22	Bruce J. Warren 2002 Revocable Trust	
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24	McGREGOR W. SCOTT UNITED STATES ATTORNEY	
25	UNITED STATES ATTORNET	
26	Dated: May 30, 2019. /s/ Kevin C. Khasigian	
27	KEVIN C. KHASIGIAN Assistant U.S. Attorney	
28	(Authorized by email)	

1	<u>ORDER</u>	
2	The Court has read and considered the Stipulation of Withdrawal of Verified Claim and	
3	Answer by Bruce J. Warren, Trustee of the Bruce J. Warren 2002 Revocable Trust ("Claimant"	
4	and Plaintiff, United States of America ("Plaintiff"), by and through their respective counsel	
5	(collectively, the "Parties"). For the reasons stated in the Stipulation and for good cause shown,	
6	IT IS HEREBY ORDERED as follows:	
7	1. The Stipulation is approved.	
8	2. Claimant's claim filed in the above-captioned case on May 31, 2018 [Dk. 12] is	
9	hereby deemed withdrawn.	
10	3. Claimant's answer filed in the above-captioned case on May 31, 2018 [Dk. 11] is	
11	hereby deemed withdrawn.	
12	4. Claimant is hereby deemed dismissed from the above-captioned case.	
13	IT IS SO ORDERED.	
14	DATED: June 4, 2019.	
15	MA Made	
16	UNITED STATES DISTRICT JUDGE	
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