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6 Attorneys for Non-Party Lienholder,  
 Socotra Fund, LLC

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

10  
 11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

Case No. 2:18-cv-00773-KJM-CKD

**STIPULATION AND  
 WITHDRAWAL OF VERIFIED  
 CLAIM, ANSWER, AND  
 AMENDED ANSWER OF NON-  
 PARTY LIENHOLDER, SOCOTRA  
 FUND, LLC**

Complaint Filed: April 4, 2018

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 15 REAL PROPERTY LOCATED AT 653  
 16 MAIN AVENUE, SACRAMENTO,  
 17 CALIFORNIA, SACRAMENTO  
 18 COUNTY, APN: 226-0240-037-0000,  
 19 INCLUDING ALL APPURTENANCES  
 AND IMPROVEMENTS THERETO,

20 REAL PROPERTY LOCATED AT  
 21 8656 DAIMLER WAY,  
 22 SACRAMENTO, CALIFORNIA,  
 23 SACRAMENTO COUNTY, APN: 115-  
 0680-059-0000, INCLUDING ALL  
 24 APPURTENANCES AND  
 IMPROVEMENTS THERETO,

25 REAL PROPERTY LOCATED AT  
 26 12660 SHARON BEE LANE,  
 27 HERALD, CALIFORNIA,  
 28 SACRAMENTO COUNTY, APN: 152-  
 0130-057-0000, INCLUDING ALL

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1 APPURTENANCES AND  
2 IMPROVEMENTS THERETO,

3 REAL PROPERTY LOCATED AT  
4 22698 N. SOWLES ROAD, ACAMPO,  
5 CALIFORNIA, SAN JOAQUIN  
6 COUNTY, APN: 007-370-09-000,  
7 INCLUDING ALL APPURTENANCES  
8 AND IMPROVEMENTS THERETO,

9 REAL PROPERTY LOCATED AT  
10 23900 N. BRYANT ROAD, ACAMPO,  
11 CALIFORNIA, SAN JOAQUIN  
12 COUNTY, APN: 007-070-470-000,  
13 INCLUDING ALL APPURTENANCES  
14 AND IMPROVEMENTS THERETO,

15 REAL PROPERTY LOCATED AT  
16 4700 BLOSSOM RANCH DRIVE, ELK  
17 GROVE, CALIFORNIA,  
18 SACRAMENTO COUNTY, APN: 132-  
19 1060-066-0000, INCLUDING ALL  
20 APPURTENANCES AND  
21 IMPROVEMENTS THERETO, and

22 REAL PROPERTY LOCATED AT  
23 7211 OVAR COURT, ELK GROVE,  
24 CALIFORNIA, SACRAMENTO  
25 COUNTY, APN: 132-1240-062-0000,  
26 INCLUDING ALL APPURTENANCES  
27 AND IMPROVEMENTS THERETO,

28 Defendants.

24 **IT IS HEREBY STIPULATED** by claimant, Socotra Fund, LLC  
25 (“Claimant”), by and through its undersigned counsel, Larissa A. Branes, Esq. of  
26 Geraci Law Firm, and Plaintiff, the United States of America (“Plaintiff”), by and  
27 through its undersigned counsel, Kevin C. Khasigian, Assistant United States  
28 Attorney, as follows:

1           1.       Claimant asserted a lienholder interest in the defendant property located  
2 at 8656 Daimler Way, Sacramento, California 95828 (“Daimler Way Property”),  
3 which maintains the following legal description:

4                   Real property in the unincorporated area of the County of Sacramento,  
5 State of California, described as follows:

6                   LOT 146, AS SHOWN ON THE “PLAT OF VINTAGE PARK UNIT  
7 NO. 4”, RECORDED IN BOOK 168 OF MAPS, MAP NO. 17,  
8 RECORDS OF SAID COUNTY.

9                   EXCEPTING THEREFROM AN UNDIVIDED 50% INTEREST IN  
10 AND TO ALL OIL, GAS OR OTHER HYDROCARBON  
11 SUBSTANCE BELOW A DEPTH OF 500 FEET WITHOUT  
12 HOWEVER, THE RIGHT OF SURFACE ENTRY, AS RESERVED  
13 IN DEED RECORDED IN BOOK 840522, PAGE 280, OFFICIAL  
14 RECORDS.

15                   A.P.N. 115-0680-059;

16           2.       The loan has since been satisfied and Claimant no longer has an interest  
17 in the Daimler Way Property;

18           3.       Accordingly, Claimant hereby withdraws its claim filed in the above-  
19 captioned case on June 13, 2018 [Dk. 19], its answer filed in the above-captioned  
20 case on June 22, 2018 [Dk. 20], and its amended answer filed in the above-captioned  
21 case on July 3, 2018 [Dk. 37] with respect to the Daimler Way Property;

22           4.       To the extent required under the *Federal Rules of Civil Procedure*, Rule  
23 41(a), Plaintiff agrees to dismiss with prejudice Claimant in the above-captioned  
24 case pursuant to the *Federal Rules of Civil Procedure*, Rule 41(a). Daimler Way  
25 Property is the *in rem* defendant.

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

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

Date: July 29, 2019

**GERACI LAW FIRM**

By: /s/ Larissa A. Branes  
Larissa A. Branes, Esq.  
Amy E. Martinez, Esq.  
Alexa P. Stephenson, Esq.  
Attorneys for Non-Party Lienholders,  
Socotra Fund, LLC

Date: July 29, 2019

**MCGREGOR W. SCOTT**  
United States Attorney

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 Socotra Fund, LLC (“the Stipulation”) by Claimant, Socotra Fund, 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 13, 2018 [Dk. 19] is hereby deemed withdrawn.
3. Claimant’s answer filed in the above-captioned case on June 22, 2018 [Dk. 20] is hereby deemed withdrawn.
4. Claimant’s amended answer filed in the above-captioned case on July 3, 2018 [Dks. 37] is hereby deemed withdrawn.
5. Claimant is hereby deemed dismissed from the above-captioned case.

**IT IS SO ORDERED.**

DATED: July 29, 2019.

  
UNITED STATES DISTRICT JUDGE