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

10
11 UNITED STATES OF AMERICA,

2:18-CV-00809-KJM-CKD

12 Plaintiff,

13 v.

STIPULATION FOR PARTIAL LIFT
OF STAY AND ORDER

14 REAL PROPERTY LOCATED 12497
CLAY STATION ROAD, HERALD,
15 CALIFORNIA, SACRAMENTO COUNTY,
APN: 152-0120-008-0000, INCLUDING
16 ALL APPURTENANCES AND
IMPROVEMENTS THERETO, ET AL.,

17 Defendants.

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19 The United States and claimant Hong Jun Jiang, through their respective counsel, hereby stipulate
20 and request the Court to lift the stay for the limited purpose of filing settlement documents for real
21 property located at 3945 Shining Star Drive, Sacramento, California, Sacramento County, APN: 049-
22 0403-015-0000 (“defendant Shining Star Drive”). The parties anticipate that, if granted, the settlement
23 documents would close the case against defendant Shining Star Drive. Thus, the stay would no longer be
24 necessary for this property.¹

25 Loan Oak Fund, LLC filed a Claim asserting a lienholder interest in defendant Shining Star Drive.
26 Claimant Hong Jun Jiang filed a Claim and Answer to the Complaint regarding defendant Shining Star

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28 ¹ The case would remain stayed as to the other five *In Rem* Defendants. This request is limited to defendant Shining Star Drive.

1 Drive. No other party has filed a claim asserting an interest in defendant Jasper Court.

2 On July 10, 2019, escrow closed for defendant Shining Star Drive. Loan Oak Fund, LLC was
3 paid in full through escrow. Loan Oak Fund, LLC withdrew their Claim on July 31, 2019.

4 The United States and claimant Hong Jun Jiang have reached a settlement regarding the net
5 proceeds from the sale of the Shining Star Drive property.

6 Dated: 9/15/2022

PHILLIP A. TALBERT
United States Attorney

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

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10 Dated: 10-3-2022


/s/ Ernest Chen
ERNEST CHEN
Attorney for claimant Hong Jun Jiang
(Signature retained by attorney)

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13
14 **ORDER**

15 For the reasons set forth above, the stay is lifted regarding the real property located at 3945
16 Shining Star Drive, Sacramento, California, Sacramento County, APN: 049-0403-015-0000.

17 IT IS SO ORDERED.

18 DATED: October 13, 2022.

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21 _____
CHIEF UNITED STATES DISTRICT JUDGE