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25 UNITED STATES DISTRICT COURT  
26 FOR THE CENTRAL DISTRICT OF CALIFORNIA

27 UNITED STATES OF AMERICA, ) No. CV 14-3140-RGK-SS  
28 Plaintiff, )  
29 v. )  
30 ) **NOTICE OF SETTLEMENT AND**  
31 \$726,951.45 IN UNITI BANK FUNDS ) **JOINT MOTION TO STAY**  
32 ) **PROCEEDINGS AND REMOVE**  
33 Defendants. ) **ACTION FROM COURT'S ACTIVE**  
34 ) **CALENDAR**

1           1.     This action (the “California Action”) was filed on April 24, 2014, against  
2 the defendant \$726,951.45 in funds held at Uniti Bank (“Defendant Funds”). Jae  
3 Yong Chun, Sang Ah Park, Yoon Yang Ja, and the Port Manleigh Trust (collectively  
4 “Claimants”) claim an interest in the Defendant Funds. No other parties other than  
5 Claimants have appeared in this case and the time for filing statements of interest and  
6 answers has expired. The Defendant Funds are in the custody and control of the  
7 United States Marshal Service (“USMS”).

8           2.     On February 18, 2015, the United States filed a Verified Complaint  
9 seeking forfeiture in United States v. A Limited Partnership Interest (Case No. 2:15-  
10 cv-814) with the United States District Court for the Eastern District of Pennsylvania  
11 (the “Pennsylvania Action”). In the Pennsylvania Action, the United States seeks to  
12 forfeit a limited partnership interest in the Philadelphia U.S. Immigration Fund (the  
13 “Defendant Security”), which is described more fully in the United States’ Complaint  
14 for Forfeiture In Rem filed in the Pennsylvania Action under 18 U.S.C. § 981.

15           3.     On February 5, 2015, the Parties informed the Court that they had  
16 reached a tentative settlement and requested that the Court vacate the discovery  
17 deadlines in the case so that the Parties could finalize the settlement. On February 9,  
18 2015, the Court issued its Order Staying Proceedings and Vacating Scheduled Dates.  
19 In that order, the Court set a new discovery cut-off date of June 22, 2015, and a new  
20 trial date of October 13, 2015.

21           4.     On March 4, 2015, Plaintiff United States of America and Claimants  
22 executed a Settlement Agreement that is dispositive of the California and  
23 Pennsylvania Actions. If the Court so desires or deems appropriate, the Parties are  
24 prepared to lodge with the Court a copy of the Settlement Agreement.

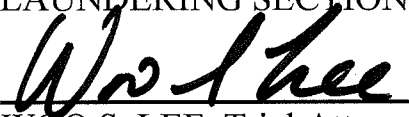
25           5.     Pursuant to the terms of the Settlement Agreement, Claimants have  
26 consented to the forfeiture of the Defendant Security in the Pennsylvania Action and  
27 agreed not to file a claim in that action. The Parties further agreed that they would  
28 stipulate and file with this Court a Proposed Consent Judgment of Forfeiture resolving

1 the California Action in its entirety within seven (7) days of a final judgment being  
2 entered in the Pennsylvania Action.

3         6.       The Parties respectfully move this Court to remove the above-captioned  
4 action from the Court's active calendar pending further order of this Court in order to  
5 provide the Parties with an opportunity to implement the Settlement Agreement. The  
6 parties suggest that the Court set a deadline of June 4, 2015, for the lodging of a  
7 proposed order resolving the matter or the filing of a joint status report.

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10 DATED: March 4, 2015

M. KENDALL DAY, Acting Chief  
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25 DATED: March 4, 2015

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