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Moss & Locke
701 University Ave, Ste 100
Sacramento, CA 95825
916-569-0667
Attorneys for Paul Chan

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

United States,

Plaintiff,

v.

Paul Chan, et. al,.

Defendants.

No. 2:96-CR-350 WBS

STIPULATION AND ORDER FOR EXONERATION OF BOND AND RETURN OF SECURITY AND PASSPORTS

In 1996, Paul Chan, also known as Ung Luong, and his two sisters, Ping Sherry Chan, also known as Sau Luong, and Lisa Le Chan, also known as Sy Luong, were each released on $50,000 secured appearance bonds. The release of the three defendants was secured by a residential property located at 8201 White Sands Way, Sacramento, California, 95828. A copy of the Deed of Trust was filed in this proceeding at Docket Number 55.

As part of their release conditions, Ping Sherry Chan and Lisa Le Chan surrendered their passports. Docket Entries 34 and 35.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Because the Court has dismissed the case against Paul Chan, Ping Sherry Chan, and Lisa Le Chan, there remains no need to the secured bonds or for the Court to retain the passports. Therefore, it is stipulated that secured bonds for Paul Chan, Ping Sherry Chan, and Lisa Le Chan should be exonerated and that the Court should reconvey the security interest, to wit, the deeds of trust by mailing the reconveyance to Bruce Locke at Moss & Locke, 701 University Avenue, Ste 100, Sacramento, CA 95825. It is further stipulated that the United States passports of Ping Sherry Chan and Lisa Le Chan, if in the possession of the Clerk of the Court, be returned to them by mailing the passports to Bruce Locke at Moss & Locke, 701 University Avenue, Ste 100, Sacramento, CA 95825.

Date: September 11, 2015

/S/ Bruce Locke
BRUCE LOCKE
Attorney for Paul Chan

Date: September 11, 2015

/S/ Bruce Locke
For GAIL SHIFMAN
Attorney for Lisa Le Chan

Date: September 11, 2015

/S/ Bruce Locke
For Randolph Daar
Attorney for Ping Sherry Chan

Date: September 11, 2015

/S/ Bruce Locke
For WILLIAM WONG
Assistant United States Attorney

ORDER

GOOD CAUSE APPEARING, and pursuant to the above stipulation, the secured bonds of Paul Chan, Ping Sherry Chan, and Lisa Le Chan are hereby exonerated. The Clerk of the Court is directed forthwith to reconvey the security interests, to wit, the deeds of trust, to Paul Chan, also

known as Ung Luong, Ping Sherry Chan, also known as Sau Luong, Lisa Le Chan, also known as Sy Luong, by mailing the reconveyance to their attorney, Bruce Locke at Moss & Locke, 701 University Avenue, Ste 100, Sacramento, CA 95825. Ping Sherry Chan's and Lisa Le Chan's passports, if in the possession of the Court, are also to be returned in the same manner. The September 21, 2015 Motion to Exonerate Bond is vacated.

Dated: September 14, 2015

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE