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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

"THE WOLF OF WALL STREET" MOTION
PICTURE, ETC.,

Defendant.

NO. CV 16-5362-DSF (PLAx)

[PROPOSED]
ORDER LIFTING STAY

Pursuant to the stipulation and request of the parties to lift the stay, and good cause appearing therefor, IT IS ORDERED that the stay in this action is lifted.

3/6/18

DATED: _____



UNITED STATES DISTRICT JUDGE

1 PRESENTED BY:

2 DEBORAH CONNOR, Acting Chief
Money Laundering and Asset Recovery Section (MLARS)

3 WOO S. LEE

4 JONATHAN BAUM

BARBARA LEVY

5 Criminal Division

U.S. Department of Justice

6

NICOLA T. HANNA

7 United States Attorney

LAWRENCE S. MIDDLETON

8 Assistant United States Attorney

Chief, Criminal Division

9

STEVEN R. WELK

10 Assistant United States Attorney

Chief, Asset Forfeiture Section

11

/s/John J. Kucera

12

JOHN J. KUCERA

JONATHAN GALATZAN

13

Assistant United States Attorneys

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Attorneys for Plaintiff

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UNITED STATES OF AMERICA

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

"THE WOLF OF WALL STREET" MOTION
PICTURE, ETC.,

Defendant.

NO. CV 16-5362-DSF (PLAx)

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1 PRESENTED BY:
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4 WOO S. LEE
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6 BARBARA LEVY
7 Criminal Division
8 U.S. Department of Justice
9
10 NICOLA T. HANNA
11 United States Attorney
12 LAWRENCE S. MIDDLETON
13 Assistant United States Attorney
14 Chief, Criminal Division
15 STEVEN R. WELK
16 Assistant United States Attorney
17 Chief, Asset Forfeiture Section
18
19 /s/John J. Kucera
20 JOHN J. KUCERA
21 JONATHAN GALATZAN
22 Assistant United States Attorneys
23
24 Attorneys for Plaintiff
25 UNITED STATES OF AMERICA
26
27
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JS-6

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

"THE WOLF OF WALL STREET" MOTION
PICTURE, ETC.,

Defendant.

NO. CV 16-5362-DSF (PLAx) *

NO. CV 17-4439-DSF (PLAx)

CONSENT JUDGMENT OF FORFEITURE

UNITED STATES OF AMERICA,

Plaintiff,

v.

"DADDY'S HOME" AND "DUMB AND
DUMBER TO" MOTION PICTURES,
ETC.,

Defendants.

On July 20, 2016, Plaintiff United States of America ("Plaintiff," the "United States," or the "Government") commenced case number CV 16-5362-DSF (PLAx), and notice was given and published in accordance with law. On August 4, 2017, the Government filed a first amended complaint, and notice was given in accordance with law.

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1. Red Granite shall:
a. Pay the amount of \$60,000,000.00 as substitute res for the Defendant Assets (the "Forfeiture Amount") in a manner consistent with the terms of the Agreement, and agrees to forfeit to the Government all rights, title, and interest in the Forfeiture Amount.

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b. In connection with any and all funds Red Granite intends to provide to satisfy any portion of the Forfeiture Amount, Red Granite shall identify the source of those funds and provide to the Government sufficient information to satisfy the Government as to the legitimacy of any and all sources of such funds, other than funds already in the possession of or held for the benefit of Red Granite (e.g., the "Paramount Funds," as defined below).

Withhold Case 143-1

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to paragraph 18(b) of the Agreement, Red Granite shall grant to the United States an additional security interest in Red Granite's rights to the proceeds from any development asset financed with such funds.

12. Upon written consent of both the Government and Red Granite, other assets may be substituted for some or all of the Collateral. *Re cover to Pigea ASIA*

13. The entirety of the Agreement shall be with recourse to the Majority Shareholder in his personal capacity, and the Majority Shareholder shall personally guarantee Red Granite's payment obligations (described in Paragraphs 8-16 of the Agreement) and the Majority Shareholder shall pledge all of his assets in whatever form held, of any type, and wherever located (the "Majority Shareholder Assets"), to the full satisfaction of Red Granite's obligation to pay the Forfeiture Amount.

14. Red Granite and the Majority Shareholder shall execute such documentation as may be reasonably necessary in order to effectuate and perfect the security interests and pledge of the Majority Shareholder Assets.

1 46. There shall be no modification of the Agreement unless in
2 writing and signed by all the parties to the Agreement or their
3 authorized representatives, *provided, however,* that the signature of
4 a representative of the Union Entities and/or Paramount shall not be
5 necessary to modify the Agreement unless the proposed modification
6 would have the effect of impairing any rights the Union Entities
7 and/or Paramount may have or assert.

8
9 DATED: 3/8/18

Wale S. Fischer

UNITED STATES DISTRICT JUDGE

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12 PRESENTED BY:

13 DEBORAH CONNOR, Acting Chief
14 Money Laundering and Asset Recovery Section (MLARS)

15 WOO S. LEE

16 JONATHAN BAUM

17 BARBARA LEVY

Criminal Division

U.S. Department of Justice

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STEVEN R. WELK

21 Assistant United States Attorney

22 Chief, Asset Forfeiture Section

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JOHN J. KUCERA

24 JONATHAN GALATZAN

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26 UNITED STATES OF AMERICA