



U. S. Department of Justice

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SENT VIA EMAIL [lorps@verizon.net](mailto:lorps@verizon.net)  
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Robert Sticht  
Law Offices of Robert Patrick Sticht  
P.O. Box 49457  
Los Angeles, CA 90049

Re: United States of America v. ██████████, et al., CV 07-  
██████ PSG(AJWx)

Dear Mr. Sticht:

In regard to your letter dated May 22, 2008 concerning a possible defendants' motion regarding the applicability of a California statute of limitations on a fraudulent transfer, please be advised that the United States is not bound by state statutes of limitations or laches in enforcing its rights. United States v. Summerlin, 310 U.S. 414, 416, 60 S.Ct. 1019, 1020, 84 L.Ed. 1283 (1940); United States v. First National Bank, 652 F.2d 882, 890 (9th Cir.1981); United States v. Weintraub, 613 F.2d 612, 618-19 (6th Cir.1979), cert. denied, 447 U.S. 905, 100 S.Ct. 2987, 64 L.Ed.2d 854 (1980).

Based on the clear authority of the United States Supreme Court, we would consider such a motion to be frivolous and in violation of Federal Rule of Civil Procedure 11.

Very truly yours,

  
DONNA FORD  
Assistant United States Attorney