

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND
Northern Division**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Civil No. CCB-13-1183
)	
Three Knife-Shaped Coins,)	
Twelve Chinese Coins, and)	
Seven Cypriot Coins,)	
Defendants.)	

**THE UNITED STATES OF AMERICA’S CROSS-MOTION FOR SUMMARY JUDGMENT
AND OPPOSITION TO CLAIMANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, United States of America, opposes Claimant’s motion for summary judgment, ECF No. 72, and cross-moves for summary judgment pursuant to Fed. R. Civ. Pro. 56 and Local Rule 105. In support of this, the United States avers as follows:

1. There is no genuine issue of material fact that the government is entitled to the forfeiture of the coins numbered 1--6, 12--13, and 16--22 on the stipulated Coin Documentation List, ECF No. 73-1 at 2. The government has met its initial burden with regard to these coins, and Claimant has not presented a valid defense or exception to the forfeiture.
2. The government is beginning the process of returning coins numbered 7--11 and 14--15 on the stipulated Coin Documentation List, ECF No. 73-1 at 2. The Guild’s arguments with regards to those coins, to the extent they are valid at all, will soon be moot.
3. The Guild is not entitled to summary judgment, fees, or costs. The arguments the Guild advances go to the validity of the underlying regulations and have been foreclosed by judicial precedent.
4. A memorandum of law is attached that more fully lays out these arguments.

CERTIFICATE OF SERVICE

I certify that on August 22, 2016, a copy of the foregoing Cross-Motion for Summary Judgment and Opposition to Claimant's Motion for Summary Judgment was caused to be served by filing that document with the Clerk of the Court under the Court's CM/ECF system, which electronically transmits a copy to the registered participants, and paper copies were mailed by first class mail, postage prepaid, to those identified as nonregistered participants.

_____/s/_____
Molissa H. Farber
Assistant United States Attorney