

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.	)	

**CLAIMANT’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. Pro. 56 and Local Rule 105, Claimant Ancient Coin Collectors Guild<sup>1</sup> (“the Guild” or “Claimant”) hereby moves for summary judgment, the return of the Guild’s property, and the payment of the Guild’s attorney’s fees and costs both in this action and the earlier declaratory judgment action brought to compel the government to file this forfeiture action. An accompanying Memorandum of Law and the Declarations of Robert Korver, Douglas Mudd, Michael McCullough, and Peter K. Tompa support this Motion.

The parties have met and conferred pursuant to Local Rule 105 (2) (c). They have agreed that Claimant will file the initial motion. Plaintiff will then file both an opposition and cross-motion for summary judgment followed by replies under the Rule.

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<sup>1</sup> The Guild is a nonprofit 501 (c) (4) organization. It has twenty-two (22) affiliate member organizations and advocates for the interests of thousands of ancient coin collectors and hundreds of small businesses of the numismatic trade. Its website may be found at <http://www.accg.us/home.aspx>. In defending its property from forfeiture, the Guild is acting on behalf of thousands of ancient coin collectors and hundreds of small businesses of the numismatic trade that only seek to hold the government accountable to the CPIA’s strict requirements. Certainly, the modest value of the vast majority of historical coins would dissuade most, if not all, collectors from contesting any forfeiture action.

Dated: July 14, 2016

Respectfully submitted,

/s/ Peter K. Tompa

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 14<sup>th</sup> of July 2016, he served the foregoing motion, memorandum, and accompanying declarations via the Court's ECF Email on the government's counsel pursuant to the Federal Rules of Civil Procedure and local rules of the District of Maryland.

/s/ Peter K. Tompa

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Peter K. Tompa