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**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PUERTO 80 PROJECTS, S.L.U.,

Plaintiff,

v.

United States of America and
Department of Homeland Security,
Immigration and Customs Enforcement,

Defendants.

Civil Action No. 1:11-cv-03983 (PAC)
**STIPULATION TO CONSOLIDATE
DOCKET ENTRIES**

It is hereby stipulated AGREED by and between the parties that:

WHEREAS, *United States v. Rojdirecta.com, et al.*, C.A. No. 11-cv-4139-PAC (S.D.N.Y.) is related to the above-captioned action;

WHEREAS, Petitioner Puerto 80 Projects, S.L.U. ("Puerto 80") has filed an appeal of the Court's denial of its Petition for Release of Seized Property in the above-captioned action;

WHEREAS, Puerto 80 has requested, and Defendant has agreed, to include the Complaint filed in C.A. No. 11-cv-4139 in their Joint Appendix filed with the Second Circuit Court of Appeals;

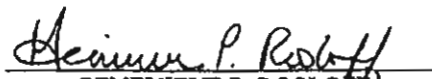
THEREFORE, the Complaint (Docket No. 1) from *United States v. Rojdirecta.com, et al.*, C.A. No. 11-cv-4139-PAC (S.D.N.Y.) shall hereby be deemed consolidated and part of the record in the above-captioned case, and the clerk is directed to docket it in the above-captioned action.

Respectfully submitted,

DURIE TANGRI LLP

Dated: September 13, 2011

By:


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UNITED STATES OF AMERICA

SO ORDERED



16 SEP 2011

