Robert Broz, et al v. CIR Doc. 6111795914

UNITED STATES COURT OF APPEALS

FOR THE SIXTH CIRCUIT

Deborah S. Hunt Clerk 100 EAST FIFTH STREET, ROOM 540 POTTER STEWART U.S. COURTHOUSE CINCINNATI, OHIO 45202-3988

Tel. (513) 564-7000 www.ca6.uscourts.gov

Filed: August 23, 2013

Mr. Arthur Thomas Catterall U.S. Department of Justice Tax Division, Appellate Section P.O. Box 502, Suite 4333 Washington, DC 20044

Mr. Paul D. Hudson Mr. Loren Mark Opper Miller Canfield 150 W. Jefferson Avenue, Suite 2500 Detroit, MI 48226

Ms. Teresa E. McLaughlin Mr. Gilbert Steven Rothenberg U.S. Department of Justice Tax Division, Appellate Section P.O. Box 502, 4326 Washington, DC 20044

Mr. William J. Wilkins Internal Revenue Service Office of Chief Counsel 1111 Constitution Avenue, N.W. Washington, DC 20224-0000

Re: Case No. 12-1403, *Robert Broz, et al v. CIR* Originating Case No. : 21629-06

Dear Counsel,

The court today announced its decision in the above-styled case.

Enclosed is a copy of the court's opinion together with the judgment which has been entered in conformity with Rule 36, Federal Rules of Appellate Procedure.

Yours very truly,

Deborah S. Hunt, Clerk

Cathryn Lovely Deputy Clerk

cc: Mr. Robert R. DiTrolio

Enclosures

Mandate to issue.