UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

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Ms. Janet A. Bradley Mr. Michael J Haungs U.S. Department of Justice Tax Division, Appellate Section P.O. Box 502 Washington, DC 20044

> Re: Case No. 13-5608, *Tripp Dargie, et al v. USA* Originating Case No. : 2:12-cv-02169

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. Thomas M. Gould

Enclosures

Mandate to issue.