

**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: June 23, 2015

Mr. Randolph Lyons Hutter
Mr. John A. Nolet
Ms. Francesca Ugolini
U.S. Department of Justice
Tax Division, Appellate Section
P.O. Box 502
Washington, DC 20044

Mr. Evan Howard Kaploe
Ms. Mary Massaron
Plunkett Cooney
38505 Woodward Avenue
Suite 2000
Bloomfield Hills, MI 48304

Re: Case No. 14-2167, *Charles Garavaglia, et al v. USA, et al*
Originating Case No. : 5:14-cv-10542

Dear Counsel,

The Court issued the enclosed Opinion today in this case.

Sincerely yours,

s/Beverly L. Harris
Case Manager
Direct Dial No. 513-564-7077

cc: Mr. David J. Weaver

Enclosure

Mandate to issue