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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA,

Petitioner,

v.

FARAMARZ BARDI,

Respondent.

No. 2:21-cv-07051-SB-JC

Order To Show Cause

1 Based upon the Petition to Enforce Internal Revenue Service Summons,
2 Memorandum of Points and Authorities, and supporting Declaration, the Court finds that
3 Petitioner has established a *prima facie* case for judicial enforcement of the subject
4 Internal Revenue Service (IRS) summons. See United States v. Powell, 379 U.S. 48, 57-
5 58, 85 S.Ct. 248, 255, 13 L.Ed.2d 112, 119 (1964).

6 **IT IS ORDERED** that Respondent Faramarz Bardi appear before this District
7 Court of the United States for the Central District of California, at the following date,
8 time, and address, to show cause why the production of those documents and records set
9 forth in Attachment A to the Agent Park declaration should not be compelled:

10 Date: October 15, 2021

11 Time: 8:30 a.m.

12 Courtroom: 6C

13 Address: United States Courthouse, 350 W. First Street, Los Angeles,
14 California, 90012
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17 **IT IS FURTHER ORDERED** that copies of the following documents be served
18 on Respondent (a) by personal delivery, (b) by leaving a copy at Respondent's dwelling
19 or usual place of abode with someone of suitable age and discretion who resides there, or
20 (c) by certified mail:

- 21 1. This Order; and
- 22 2. The Petition, Memorandum of Points and Authorities, and accompanying
23 Declaration.

24 Service may be made by any employee of the IRS or the United States Attorney's
25 Office.

26 **IT IS FURTHER ORDERED** that within ten (10) days after service upon
27 Respondent of the herein described documents, Respondent shall file and serve a written
28 response, supported by appropriate sworn statements, as well as any desired motions. If,
prior to the return date of this order, Respondent files a response with the Court stating

1 that Respondent does not oppose the relief sought in the Petition, nor wish to make an
2 appearance, then the appearance of Respondent at any hearing pursuant to this Order to
3 Show Cause is excused, and Respondent shall comply with the summons within ten (10)
4 days thereafter.

5 **IT IS FURTHER ORDERED** that all motions and issues raised by the pleadings
6 will be considered on the return date of this Order. Only those issues raised by motion
7 or brought into controversy by the responsive pleadings and supported by sworn
8 statements filed within ten (10) days after service of the herein described documents will
9 be considered by the Court. All allegations in the Petition not contested by such
10 responsive pleadings or by sworn statements will be deemed admitted.
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12 Dated: September 7, 2021

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15 Stanley Blumenfeld, Jr.
16 United States District Judge
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