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7	Attorneys for Petitioner United States of America				
8	IN THE UNITED STATES DISTRICT COURT				
9	EASTERN DISTRICT OF CALIFORNIA				
10					
11	UNITED STATES OF AMERICA,	1:14-cv-01335-AWI-SKO			
12	Petitioner,	DETITIONED'S DEQUEST EOD			
13	v.	PETITIONER'S REQUEST FOR EXTENSION OF TIME TO FILE A STATUS			
14	JOSE OCHOA,	REPORT REGARDING RESPONDENT'S COMPLIANCE WITH THE I.R.S.			
15	Respondent.	SUMMONS; ORDER			
16		Tauraana			
17		Taxpayer: JOSE OCHOA			
18					
19	Petitioner, the UNITED STATES OF AMERICA, hereby requests that the Court grant a				
20	30-day extension of time for Petitioner to file a Status Report regarding Respondent's				
21	compliance with the subpoena. The additional time is needed in order for (1) Petitioner to serve				
22	the November 17, 2014 Enforcement Order (Dkt. 9) on Respondent; (2) allow Petitioner				
23	additional time to schedule another appearance with Respondent to comply with the summons;				
24	and (3) to file a Status Report regarding Respondent's compliance. The reasons are in the				
25	within Declaration of Paulette A. Tremblay. In the event that his request is granted, a proposed				
26	order is submitted within.				
27	///				
28	///				
	PETITIONER'S REQUEST FOR EXTENSION OF TIME				

1	Dated: December 5, 2014	Respectfully submitted,
1 2	Dated. December 3, 2014	BENJAMIN B. WAGNER
2 3		United States Attorney
4		
5	By:	<u>/s/ YHimel</u> YOSHINORI H. T. HIMEL
6		Assistant U.S. Attorney
7		Attorneys for Petitioner United States of America
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	PETITIONER'S REQUEST FOR EXTENSION OF TIME TO FILE A STATUS REPORT; ORDER	

DECLARATION OF PAULETTE M. TREMBLAY

I, Paulette M. Tremblay, under 28 U.S.C. § 1746(2), declares:

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I am a Paralegal Specialist in the office of the United States Attorney for the
 Eastern District of California, with post of duty at Fresno, California. In Fresno tax summons
 enforcement actions, my duties include drafting and filing all papers filed by the United States,
 communicating with the investigating IRS employee, arranging and maintaining all case dates
 and schedules, and arranging compliance with all orders. The purpose of this declaration is to
 explain why the requested extension is needed.

9 2. Paragraph 6 in the Order Adopting Findings and Recommendations that the
10 Summons Be Enforced, filed November 17, 2014, required the United States to file a Status
11 Report regarding respondent's compliance with the enforced IRS summons by November 26,
12 2014.

133. 3. During the week of November 17, 2014, I was out of the office on personal leave
14 and did not return until December 1, 2014.

14. On December 3, 2014, I read the Order Adopting Findings and Recommendations
That The Summons Be Enforced, filed November 17, 2014, and learned about the Status Report
due no later than November 26, 2014.

18 I declare under penalty of perjury that the foregoing is true and correct. Executed on19 December 5, 2014.

/s/Paulette M. Tremblay Paulette M. Tremblay

1	ORDER		
2	IT IS HEREBY ORDERED that Petitioner United States of America shall file its Status		
3	Report regarding Respondent's compliance with the I.R.S. Summons by no later than December		
4	26, 2014.		
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6	IT IS SO ORDERED.		
7	Dated: <u>December 5, 2014</u>		
8	SENIOR DISTRICT JUDGE		
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20	PETITIONER'S REQUEST FOR EXTENSION OF TIME 4 TO FILE A STATUS REPORT; ORDER		