1 BENJAMIN B. WAGNER United States Attorney 2 ADAM R. SMART 3 Trial Attorney, Tax Division U.S. Department of Justice 4 P.O. Box 683, Ben Franklin Station Washington, D.C. 20044-0683 5 Telephone: (202) 307-6422 Facsimile: (202) 307-0054 6 E-mail: adam.r.smart@usdoj.gov 7 Attorneys for the United States of America 8 Robert S. McWhorter NOSSAMAN LLP 9 915 L Street, Suite 1000 Sacramento, CA 95814 10 Telephone: (916) 442-8888 11 Facsimile: (916) 442-0382 E-mail: rmcwhorter@nossaman.com 12 Attorneys for U.S. Bank National Association 13 IN THE UNITED STATES DISTRICT COURT FOR THE 14 EASTERN DISTRICT OF CALIFORNIA 15 16 UNITED STATES OF AMERICA, Civil No. 2:10-cv-1964-KJM-GGH 17 Plaintiff, JOINT REQUEST TO EXTEND DATES 18 FOR FILING OF DISPOSITION v. DOCUMENTS AND PROPOSED ORDER 19 U.S. BANK NATIONAL ASSOCIATION, 20 Defendants. 21 Pursuant to Local Rule 16(b) the parties hereby jointly request an extension of the deadline to file 22 disposition documents in the above captioned action for ten (10) days. The current deadline to file the 23 necessary disposition documents is July 1, 2011. Thus, the parties jointly request a new deadline of July 24 11, 2011. The purpose of this request is to allow the parties an additional one week to fully effectuate 25 the terms of the settlement agreement prior to filing disposition documents with the Court. The parties 26 believe that this short extension will provide the necessary time to do so. 27 28

1	WHEREFORE, the parties request that, consistent with this joint request, the Court extend the	
2	deadline to file disposition papers with the Court currently set for July 1, 2011 to July 11, 2011.	
3	Dated this 1st day of July 2011	
4	.	Respectfully Submitted,
5		BENJAMIN B. WAGNER
6		United States Attorney
7		/s/ Adam R. Smart ADAM R. SMART
8		Frial Attorney, Tax Division United States Department of Justice
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13		
	-	/s/ Robert S. McWhorter Robert S. McWhorter
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17		
18		Attorneys for Defendant, U.S. Bank National Association
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20	IT IS SO ORDERED	
21	Date: July 6, 2011.	11 A 11 1 /
22	<u></u>	NITED STATES DISTRICT JUDGE
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1	<u>CERTIFICATE OF SERVICE</u>	
2	I HEREBY CERTIFY that on this 1st day of July, 2011, I electronically filed the foregoing with the	
3	Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:	
4		
5	Robert S. McWhorter NOSSAMAN LLP	
6	915 L Street, Suite 1000 Sacramento, CA 95814	
7		
8	/s/ Adam R. Smart	
9	ADAM R. SMART Trial Attorney, Tax Division	
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