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7 Phillip A. Talbert  
8 United States Attorney  
9 Eastern District of California  
10 *Of Counsel*

11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES,

13 Plaintiff,

14 v.

15 ABOLGHASSEM (ABE) ALIZADEH; et  
16 al.

17 Defendants.

Case No. 2:14-cv-00577-TLN-KJN

**STIPULATED REQUEST TO CONTINUE  
HEARING ON MOTION FOR SUMMARY  
JUDGMENT**

Date: September 21, 2017

Time: 2:00 p.m.

Room: Courtroom 2, 15th floor

Judge: Hon. Troy L. Nunley

21 The United States and all defendants respectfully request that the hearing on the  
22 United States Motion for Summary Judgment, set for September 21, 2017, at 2:00 p.m.,  
23 before the Honorable United States District Judge Troy L. Nunley, be continued to  
24 December 14, 2017, at 2 p.m. This request is to provide time to review an offer received  
25 on September 6, 2017, to resolve this entire matter. The offer is signed by all parties but  
26 one, and representations have been made that the final defendant is also prepared to  
27

1 agree. The trial attorney for the United States is prepared to recommend the offer, but  
2 additional time is required so that the appropriate official may consider the offer. The  
3 parties accordingly request an order resetting the hearing on September 21 to the  
4 December 14 calendar. A proposed order pursuant to Local Rule 143(b) is set forth  
5 below.  
6

7 Respectfully submitted,

8 DAVID A. HUBBERT  
Acting Assistant Attorney General

9 Dated: September 11, 2017

10 /s/ G. Patrick Jennings  
G. PATRICK JENNINGS  
Trial Attorney, Tax Division  
U.S. Department of Justice  
11

12 Date: September 8, 2017

13 /s/ Paul Anthony Warner  
PAUL ANTHONY WARNER  
Attorney at Law

14 Attorney for Abolghassem (Abe) Alizadeh,  
15 Mehran (Mike) Alizadeh, Mitra Alizadeh, Suede  
Blue Inc., Pegasus Restaurant Group, Inc.;  
16 Lake Orta Corporation; Phoenix Restaurant  
Group, Inc.; Voyager Restaurant Group, Inc.;  
17 Endeavor Restaurant Group, Inc.

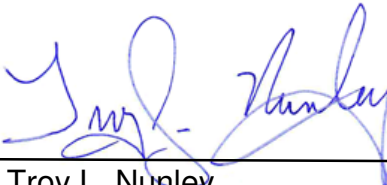
18 Date: September 11, 2017

19 /s/ Mir Saied Kashani  
MIR SAIED KASHANI  
Kashani Law Office  
saiedkashani@gmail.com

20  
21 Attorney for Azita Alizadeh

22 **IT IS SO ORDERED.**

23 Dated: September 11, 2017

24  
25 

26 Troy L. Nunley  
27 United States District Judge  
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