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11 Phillip A. Talbert
12 United States Attorney
13 Eastern District of California
14 *Of Counsel*

15 IN THE UNITED STATES DISTRICT COURT

16 FOR THE EASTERN DISTRICT OF CALIFORNIA

17 UNITED STATES,

18 Plaintiff,

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

20 v.

21 ABOLGHASSEM (ABE) ALIZADEH; et
22 al.

23 Defendants.

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

26 Date: September 21, 2017

27 Time: 2:00 p.m.

28 Room: Courtroom 2, 15th floor

1 Judge: Hon. Troy L. Nunley

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

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
9 Acting Assistant Attorney General

10 Dated: September 11, 2017

11
12 /s/ G. Patrick Jennings
13 G. PATRICK JENNINGS
14 Trial Attorney, Tax Division
15 U.S. Department of Justice

16 Date: September 8, 2017

17
18 /s/ Paul Anthony Warner
19 PAUL ANTHONY WARNER
20 Attorney at Law

21
22 Attorney for Abolghassem (Abe) Alizadeh,
23 Mehran (Mike) Alizadeh, Mitra Alizadeh, Suede
24 Blue Inc., Pegasus Restaurant Group, Inc.;
25 Lake Orta Corporation; Phoenix Restaurant
26 Group, Inc.; Voyager Restaurant Group, Inc.;
27 Endeavor Restaurant Group, Inc.

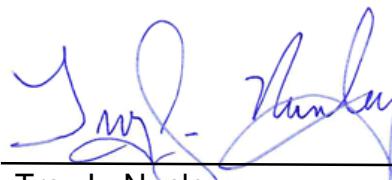
28 Date: September 11, 2017

29
30 /s/ Mir Saeid Kashani
31 MIR SAEID KASHANI
32 Kashani Law Office
33 saiedkashani@gmail.com

34 Attorney for Azita Alizadeh

35 **IT IS SO ORDERED.**

36 Dated: September 11, 2017

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40 Troy L. Nunley
41 United States District Judge