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7 Attorneys for Petitioner United States of America

8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **EASTERN DISTRICT OF CALIFORNIA**

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 11 UNITED STATES OF AMERICA,  
 12  
 13 Petitioner,  
 v.

14 WILLIAM C. CANEPA,  
 15  
 16 Respondent.

**2:17-CV-1020-TLN-EFB**

**PETITIONER’S SECOND REQUEST FOR CONTINUANCE OF ORDER TO SHOW CAUSE HEARING; [PROPOSED] ORDER**

**Taxpayer: WILLIAM C. CANEPA**

**OLD HEARING DATE:**

**Date: September 27, 2017**  
**Time: 10:00 a.m.**  
**Courtroom: 8 (13th Floor)**

**NEW HEARING DATE:**

**Date: November 8, 2017**  
**Time: 10:00 a.m.**  
**Courtroom: 8 (13th Floor)**

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 22 Petitioner United States of America hereby requests that the Court grant a second continuance of  
 23 the Order to Show Cause Hearing Re: Tax Summons Enforcement currently scheduled for Wednesday,  
 24 September 27, 2017, at 10:00 a.m., in Courtroom No. 8, before the Honorable Edmund F. Brennan, to  
 25 Wednesday, November 8, 2017, at 10:00 a.m. Petitioner was granted one previous continuance. ECF 7.  
 26 The additional time is needed because the power of attorney that the Respondent engaged to represent  
 27 him before the Internal Revenue Service (IRS) has provided to IRS Revenue Officer Cynthia Kallich  
 28 some but not all of the records requested under the summons. Respondent’s power of attorney has

1 conveyed to Revenue Officer Kallich that he is diligently working with the Respondent to produce the  
2 balance of the records and achieve full compliance with the summons. If compliance is achieved, then  
3 the need for the OSC hearing will become moot. Petitioner wants to provide the Respondent and his  
4 power of attorney this additional time to cooperate and comply with the tax summons. A proposed  
5 Order is submitted herewith.

6 Respectfully submitted,

7 DATED: September 25, 2017

PHILLIP A. TALBERT  
United States Attorney

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10 /s/Bobbie J. Montoya  
BOBBIE J. MONTOYA  
Assistant United States Attorney

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14 **ORDER**

15 IT IS HEREBY ORDERED that the Order to Show Cause Hearing is continued to Wednesday,  
16 November 8, 2017, at 10:00 a.m., in Courtroom No. 8.

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18 DATED: September 25, 2017.

  
UNITED STATES MAGISTRATE JUDGE