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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 SHASTA STRATEGIC INVESTMENT FUND,
16 LLC; AND PRESIDIO GROWTH LLC (Tax
Matters Partner),

17 Petitioners,

18 v.

19 UNITED STATES OF AMERICA,

20 Respondent.

Case No. C-04-4264-RS

(Related to Case Nos. C-04-4309-RS, C-04-4398-RS, C-04-4964-RS, C-05-1123-RS, C-05-1996-RS, C-05-2835-RS, and C-05-3887-RS)

**STIPULATION AND ~~PROPOSED~~
SCHEDULING ORDER RE:
ADDITIONAL MOTIONS FOR
SUMMARY JUDGMENT**

21 Pursuant to the Court's direction in the Civil Minute Order of September 25, 2014 (ECF
22 No. 255), the Petitioners and the Respondent respectfully jointly propose the following schedule
23 for the additional round of summary judgment briefing:

24 1. Simultaneous cross-motions for summary judgment shall be filed no later than **October**
25 **29, 2014.**

26 2. Responses to the cross-motions shall be filed no later than **November 14, 2014.**

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1 3. Replies to the responses shall be filed no later than **December 3, 2014**.

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3 Respectfully submitted this 2nd day of October, 2014.

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5 /s/ Nicholas Y. Lin [by permission]

6 NICHOLAS Y. LIN
7 Latham & Watkins
8 Attorney for Petitioners

9 /s/ Adam Strait

10 ADAM D. STRAIT
11 Trial Attorney
12 Tax Division, Department of Justice
13 Attorney for Respondent

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15 **Pursuant to stipulation, it is SO ORDERED.**

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17 Dated this 2nd day of October, 2014.

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HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE