1 JOSEPH RUSSONIELLO (CSBN 44332) United States Attorney THOMAS MOORE (ASBN 4305-078T) 2 Assistant United States Attorney 3 Chief, Tax Division BLAKE D. STAMM (CTBN 301887) Assistant United States Attorney 4 9th Floor Federal Building 5 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102 Telephone: (415) 436-7063 6 Attorneys for the United States of America 7 UNITED STATES DISTRICT COURT 8 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION UNITED STATES OF AMERICA 11 Case No. C-08-04371-MMC 12 Plaintiff. STIPULATION TO CONTINUE CASE 13 MANAGEMENT CONFERENCE AND v. -[proposed] ORDER THEREON DOUGLAS R. CARAWAY, et al., 14 15 Defendants 16 17 It is hereby stipulated by and between Plaintiff United States of America and Defendants, Douglas Caraway, Franchise Tax Board and Employment Development 18 19 Department, through their respective counsel, that the case management conference be 20 continued from June 18, 2010 at 10:30 a.m to August 6, 2010 or a date thereafter at the 21 Court's convenience. . 22 Though the Court has granted several prior continuances, counsel for defendant Caraway and a retained accountant have finalized tax returns for the years at issue1999 23 24 through 2004 inclusive. On June 3, 2010, through counsel, they provided U.S. Individual Income Tax Returns, Forms 1040 of defendant Caraway, for the years 1999, 2000 and 25 26 2001 and supporting documentation both to this Office and to the IRS for review. They 27 plan to complete returns for the remaining years and make them and underlying records available to the government for review within the next week to two. An additional 28

1	continuance would allow defendant Caraway to continue this progress and adequate time
2	for the government to complete its review.
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6	EDMUND G. BROWN JR. Attorney General of the State of California JOSEPH P. RUSSONIELLO United States Attorney
7	Trustiney General of the State of Camornia Chited States Trustiney
8	/s KAREN YIU BLAKE D. STAMM
9	Deputy Attorney General Assistant United States Attorney Attorneys for Franchise Tax Board Attorneys for the United States
10	and Employment Development Department
11	
12	/s
13	BARBARA MORRISON TAGGART & HAWKINS, PC
14	Attorney for Douglas Caraway
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16	PURSUANT TO STIPULATION, IT IS SO ORDERED. Specifically, the
17	Case Management Conference is CONTINUED to August 6, 2010.
18	Dated: June 9, 2010 THE HONGRABLE MAXINE M. TESNEY LINETED STATES DISTRICT COLUMN HIDGE
19	UNITED STATES DISTRICT COURT JUDGE
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	Stipulation and [proposed] Order,

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Case No. CV-08-04371 MMC