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 8 **IN THE UNITED STATES DISTRICT COURT FOR THE**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**  
 10 **SAN FRANCISCO DIVISION**

11 <b>UNITED STATES OF AMERICA and</b> <b>ETHAN WALPOLE, Revenue Officer,</b> 12 13 <b>Petitioners,</b> v. 14 <b>JEAN-SEBASTIEN BLOT,</b> 15 <b>Respondent.</b> 16	) ) <b>CASE NO. 09-cv-3722-EMC</b> ) ) <b>STIPULATION RE: (1) ENFORCING</b> ) <b>SUMMONS, (2) VACATING CASE</b> ) <b>MANAGEMENT CONFERENCE,</b> ) <b>(3) CONSENTING TO JURISDICTION</b> ) <b>OF MAGISTRATE JUDGE, &amp;</b> ) <b>(4) DISMISSING CASE</b> ) )
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17 1. Currently, a Case Management Conference is set in this matter on November 17,  
 18 2009, at 1:30 p.m. On November 10, 2009, the parties submitted a joint Case Management  
 19 Statement that provides dates for voluntary compliance with the summons at issue, which is  
 20 attached to the petition filed in this case. As noted in the Case Management Statement, the  
 21 parties agree that respondent shall provide the documents requested in the summons by January  
 22 30, 2010.

23 2. The parties further agree that the summons served on respondent, which is the  
 24 summons at issue in this matter, is enforceable in that: (1) there is a legitimate purpose for the  
 25 request; (2) that the material sought is relevant to that purpose; (3) the material sought is not  
 26 already within the IRS's possession; and (4) those administrative steps which are required have  
 27 been satisfied.

28 3. In accordance with the provisions of Title 28, U.S.C. Section 636(c), the parties

1 agree to voluntarily consent to have a United States Magistrate Judge conduct any and all further  
2 proceedings in the case, including trial, and order the entry of a final judgment. Appeal from the  
3 judgment shall be taken directly to the United States Court of Appeals for the Ninth Circuit.

4 4. The parties further agree, and respectfully request, that the Case Management  
5 Conference should be vacated as the parties shall make a good faith effort to resolve this matter  
6 prior to January 30, 2010.

7 5. The parties further agree to dismissal of this case, which may be re-opened by  
8 either party should any disagreement arise regarding whether respondent has fully complied with  
9 the summons.

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Respectfully submitted,  
JOSEPH P. RUSSONIELLO  
United States Attorney

/s/ Thomas M. Newman  
THOMAS M. NEWMAN  
Assistant United States Attorney  
Tax Division

/s/ [Signature]  
Jean Sebastien Blot  
Respondent

