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1 MELINDA HAAG (CSBN 132612) 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 Fax: (415) 436-6748 7 Attorneys for the United States of America 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 JOSE REYNOSO. No. C-10-00098 SC 12 Plaintiff, STIPULATION TO EXTEND PERIOD TO 13 CALCULATE INTEREST AND v. 14 [Proposed] ORDER UNITED STATES OF AMERICA. 15 Defendant. 16 1. On December 21, 2010, the Court granted summary judgment in favor of the 17 government in the above-captioned matter. 18 2. 19 The Court incorporated into its order the requirement that the parties meet and confer to 20 determine the amount of interest on the remaining amount due plaintiff. 3. The Court further ordered the parties to provide a joint or separate declaration within 21 ten days of its order. 22 4. Counsel for the government will be out of the Country for the period December 23, 23 24 2010 to January 3, 2011. 5. The government will require the coordination of the Internal Revenue Service to 25 complete the interest calculation for purposes of judgment. 26 27 6. Accordingly, the parties stipulate and respectfully request the Court to extend the period

to calculate interest and file their joint or respective declarations until Tuesday, January 18, 2011.

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3	Respectfully submitted,
4	MELINDA HAAG
5	United States Attorney
6	BLAKE D. STAMM
7	Assistant United States Attorney
8	/s
9	PAUL HAM Attorney for Plaintiff, Jose Reynoso
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13	SO ORDERED, this27 day of _Dec, 2010.
14	THE HONORABLE SAMUEL CONTI
15	United States District Judge Northern District of California
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