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

12	JOHN AND BARBARA BROOKS,)	CASE NO. C-10-3541-SC
13	Plaintiffs)	REVISED STIPULATION TO
14	v.)	CONTINUE ANSWER DATE
15	UNITED STATES OF AMERICA,)	AND CASE MANAGEMENT
16	Defendant.)	PROPOSED ORDER
17)	

18 1. Circumstances beyond the control of the parties and counsel have required a change in
 19 plaintiffs' representation. John M. Youngquist will substitute as plaintiffs' attorney for John
 20 Gigounas who must withdraw due to a medical condition making it impossible for him to
 21 continue in his representation of plaintiffs.

22 2. Mr. Youngquist has requested a continuance of the Case Management Conference of
 23 ninety days to inform himself on the case. The Court has provided a date of April 29, 2011 and
 24 both plaintiffs and the government stipulate to that date.

25 3. The parties further stipulate that the government's date to answer to the Complaint in
 26 this matter will be extended to March 29, 2011. The government is continuing in its efforts to
 27 obtain additional records from the IRS to complete its answer.

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1 4. The Court had scheduled a Case Management Conference in this matter for January
2 21, 2011. The parties wish an opportunity to review the expected IRS materials to determine
3 whether they may resolve this matter without further litigation.

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5 MELINDA HAAG
United States Attorney

6 Dated: January 19, 2011

7 /s/ Blake D. Stamm
BLAKE D. STAMM
8 Assistant United States Attorney
Tax Division
9 Attorneys for United States of America

10 Dated: January 19, 2011

11 /s/ John Youngquist
JOHN YOUNGQUIST
12 Attorney for Plaintiffs

13 **PROPOSED ORDER**


14 In accordance with the parties' stipulation:

15 A. The government shall file its answer by March 29, 2011;

16 B. The Case Management Conference in this matter is continued until April 29, 2011
17 and a joint Case Management Conference Statement shall be due by April 22, 2011.

18 IT IS SO ORDERED.

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20 Dated: 2/7/11

21 THE HONORABLE SAMUEL A. CONTI
UNITED STATES DISTRICT COURT JUDGE
22 
23 JUDGE SAMUEL CONTI
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