1 2 3 4 5 6	Henry G. Wykowski (State Bar No. 068255) <b>HENRY G. WYKOWSKI &amp; ASSOCIATES</b> 235 Montgomery Street, Suite 657 San Francisco, CA 94104 Telephone: (415) 788-4545 Facsimile: (415) 788-4546 <i>Attorneys for Respondent</i> GRASS ROOTS NONPROFIT COLLECTIVE
7	UNITED STATES DISTRICT COURT
8	NORTHERN DISTRICT OF CALIFORNIA
9	SAN FRANCISCO DIVISION
10	
11	UNITED STATES OF AMERICA, No. CV 13 5780 SC
12 13	Petitioner, STIPULATION AND [PROPOSED] ORDER RESCHEDULING HEARING
15 14	v. ON ORDER TO SHOW CAUSE AS TO WHY SUMMONS SHOULD NOT BE
15	GRASS ROOTS NONPROFIT COLLECTIVE INC., ENFORCED AND EXTENDING DEADLINE FOR RESPONDENT TO
16	Respondent . RESPOND
17	Petition Filed: December 13, 2013 The Honorable Samuel Conti
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19	
20	1. WHEREAS, this Court previously ordered that Respondent Grass Roots Nonprofit
21	Collective, Inc. file a written response to the Court's Order to Show Cause by March 3, 2014.
22	2. WHEREAS, this Court previously ordered that a hearing on the Order to Show
23	Cause be held on March 21, 2014 at 10:00 A.M.
24	3. WHEREAS, counsel for Petitioner and counsel for Respondent are presently
25	negotiating a resolution to this petition that may eliminate the need for the Court to issue a ruling,
26	the parties have agreed to continue the presently pending deadline and hearing date.
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28	STIPULATION AND PROPOSED ORDER
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1	THE PARTIES HEREBY STIPULATE AS FOLLOWS:
2	1. The time for Respondent to respond to the Order to Show Cause is hereby continued 60
3	days to May 2, 2014, and the hearing on the Order to show cause is hereby continued to
4	May 20 <sup>th</sup> , at a time convenient for the court.
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0 7	/s/ Thomas Moore
8	THOMAS MOORE Assistant United States Attorney Tax Division
9	Counsel for Petitioner
10	/s/ Henry Wykowski
11	HENRY WYKOWSKI Counsel for Respondent
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13 14	[ <del>PROPOSED</del> ] ORDER
15	
16	GOOD CAUSE APPEARING, and in the interests of justice, it is hereby ordered that the
17	deadline for Respondent to file a response to the Order to Show Cause is hereby continued to
18	May 2, 2014, and the hearing on the Order to Show Cause is hereby continued and shall be held
19	on May $20^{th}$ (May 30, 2014) at 10:00 a.m.
20	SO ORDERED
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22 23	03/06/2014 DATE
23	Z S muel Conti
25	Z Judge Samuel Conti
26	
27	THERN DISTRICT OF CEN
28	STIPULATION AND PROPOSED ORDER
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