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4 *Attorneys for Respondent*  
 5 GRASS ROOTS NONPROFIT COLLECTIVE

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 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 Petitioner,

13 v.

14 GRASS ROOTS NONPROFIT  
 15 COLLECTIVE INC.,

**STIPULATION AND ~~PROPOSED~~  
 ORDER RESCHEDULING HEARING ON  
 ORDER TO SHOW CAUSE AS TO WHY  
 SUMMONS SHOULD NOT BE ENFORCED  
 AND EXTENDING DEADLINE FOR  
 RESPONDENT TO RESPOND**

16 Respondent .

**Petition Filed: December 13, 2013  
 The Honorable Samuel Conti**

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 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 January 31, 2014.

22 2. WHEREAS, this Court previously ordered that a hearing on the Order to Show  
 23 Cause be held on February 21, 2014 at 10:00 A.M.

24 3. WHEREAS, counsel for Respondent was already committed to be out of the  
 25 county on business on February 21<sup>st</sup>.

26 4. WHEREAS, counsel for Petitioner and counsel for Respondent are presently  
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1 negotiating a resolution to this petition that may eliminate the need for the Court to issue a ruling,  
2 the parties have agreed to continue the presently pending deadline and hearing date.

3 THE PARTIES HEREBY STIPULATE AS FOLLOWS:

- 4  
5 1. The time for Respondent to respond to the Order to Show Cause is hereby continued to  
6 March 3<sup>rd</sup>, 2014, and the hearing on the Order to show cause is hereby continued to March  
7 21<sup>st</sup>, at a time convenient for the court.

8  
9 /s/ Thomas Moore  
10 THOMAS MOORE  
11 Assistant United States Attorney  
12 Tax Division  
13 *Counsel for Petitioner*

14 /s/ Henry Wykowski  
15 HENRY WYKOWSKI  
16 *Counsel for Respondent*

17 ~~PROPOSED~~ ORDER

18 GOOD CAUSE APPEARING, and in the interests of justice, it is hereby ordered that the  
19 deadline for Respondent to file a response to the Order to Show Cause is hereby continued to  
20 March 3, 2014, and the hearing on the Order to Show Cause is hereby continued and shall be held  
21 on March 21<sup>st</sup> ( \_\_\_\_\_ ) at 10:00 a.m. .

22 SO ORDERED

23  
24 02/05/2014

25 \_\_\_\_\_  
26 DATE

