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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA, ) No. 3:14-cv-1243 JCS  
12 )  
13 Petitioner, ) [~~Proposed~~]  
14 v. ) ORDER TO SHOW CAUSE RE  
15 ) ENFORCEMENT OF INTERNAL  
16 ROBERT F. LEITAO, ) REVENUE SERVICE SUMMONS  
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17 Good cause having been shown by the petitioner upon its petition filed in the above-entitled  
18 proceeding on March 17, 2014, it is hereby:

19 ORDERED that respondent ROBERT F. LEITAO appear before this Court on the **23rd day of**  
20 **May, 2014, at 9:30 a.m., in Courtroom No. G, 15th Floor**, United States District Court, 450 Golden  
21 Gate Avenue, San Francisco, California, and then and there show cause, if any, why respondent should  
22 not be compelled to appear and provide documents and testimony as required by the summons  
23 heretofore served upon respondent as alleged and set forth in particular in said petition; and it is further

24 ORDERED that a copy of this Order to Show Cause, together with a copy of the aforesaid  
25 petition, be served upon said respondent in accordance with Rule 4 of the Federal Rules of Civil  
26 Procedure at least thirty-five (35) days before the return date of this Order above specified; and it is  
27 further:

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1 ORDERED that within twenty-one (21) days before the return date of this Order, respondents  
2 may file and serve a written response to the petition, supported by appropriate affidavit(s) or  
3 declaration(s) in conformance with 28 U.S.C. § 1746, as well as any motion respondent desire to make,  
4 that the petitioner may file and serve a written reply to such response, if any, within fourteen (14) days  
5 before the return date of this Order; that all motions and issues raised by the pleadings will be  
6 considered on the return date of this Order, and only those issues raised by motion or brought into  
7 controversy by the responsive pleadings and supported by affidavit(s) or declaration(s) will be  
8 considered at the return of this Order, and any uncontested allegation in the petition will be considered  
9 admitted.

10 ORDERED this 26th day of March, 2014, at San Francisco, California.

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14 UNITED STATES MAGISTRATE JUDGE  
15 Joseph C. Spero  
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