1	BRIAN J. STRETCH (CABN 163973) Acting United States Attorney		
2	THOMAS MOORE (ALBN 4305-078T)		
3	Chief, Tax Division		
4	MICHAEL G. PITMAN (DCBN 484164) Assistant United States Attorney, Tax Division		
5	150 Almaden Boulevard, Suite 900 San Jose, CA 95113 Telephone: (408) 535-5040 Facsimile: (408) 535-5081 michael.g.pitman@usdoj.gov		
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8	Attorneys for the United States of America		
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCISCO DIVISION		
12		C' 'IN 2.15 04245 ICT	
13	United States of America,	Civil No. 3:15-cv-04345-JST	
14	Petitioner,	STIPULATION AND [PROPOSED] ORDER GRANTING PETITIONER UNITED	
15	V.	STATES OF AMERICA'S PETITION TO ENFORCE IRS SUMMONS	
16	Sigurd Anderson,		
17	Respondent.		
18	IT IC HEDEDY CTIDLII ATED AND AC	SDEED by Datition on the United States of America and	
19	IT IS HEREBY STIPULATED AND AGREED by Petitioner the United States of America, and		
20	Respondent Sigurd Anderson, by and through undersigned counsel:		
21	1. This Stipulation is entered into by and between all parties to this matter The Court has invited at a count his matter and a 26 U.S. C. \$\$ 7402(b) \$2 7604(c) and 28		
22 23	2. The Court has jurisdiction over this matter under 26 U.S. C. §§ 7402(b) & 7604(a), and 28 U.S. C. § 1245, and varyage is greater in the Northern District of Collifornia gargagent to 28 U.S. C. § 1201		
	U.S.C. § 1345, and venue is proper in the Northern District of California pursuant to 28 U.S.C. § 1391.		
24 25	3. The United States has established, by way of its Verified Petition to Enforce Internal		
	Revenue Service Summons and the Declaration in support thereof, a prima facie case under <i>United</i>		
26 27	States v. Powell, 379 U.S. 48 (1964) for enforcement of the Internal Revenue Service summons dated June 24, 2015, a copy of which is attached as Exhibit 2 to the United States' Petition.		
	4. Respondent does not seek to rebut the government's prima facia showing.		
28	4. Respondent does not seek to rebui	t the government's prima facia snowing.	

1	5. The United States is entitled to er	ntry of the [Proposed] Order attached hereto enforcing
2	the summons at issue, and ordering Respondent to comply therewith.	
3		
4	Respectfully submitted this 21st day of Novemb	er, 2016,
5		BRIAN J. STRETCH Acting United States Attorney
6		s/ Michael G. Pitman
7		MICHAEL G. PITMAN Assistant United States Attorney, Tax Division
8		Attorneys for United States of America
10		<u>s/ Jay R. Weill</u> JAY R. WEILL
11		SIDEMAN & BANCROFT LLP One Embarcadero Center, Twenty-Second Floor
12		San Francisco, California 94111-3711 E-Mail: jweill@sideman.com
13		Telephone: (415) 392-1960 Facsimile: (415) 392-0827
14		Attorneys for Respondent Sigurd Anderson
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16		
17	[PROPO	OSED] ORDER
18	Based upon the Stipulation of the parties	, the United States' Verified Petition to Enforce Internal
19	Revenue Service Summons, the Declaration in support thereof, and for good cause shown, IT IS	
20	HEREBY ORDERED as follows:	
21	1. The United States has established	l a prima facie case under <i>United States v. Powell</i> , 379
22	U.S. 48 (1964) for enforcement of the Internal R	evenue Service summons at issue, and Respondent does
23	not seek to rebut the government's prima facia s	howing. Accordingly, the Court GRANTS the United
24	States' petition to enforce the Internal Revenue S	Service summons attached as Exhibit 2 to the United
25	States' Petition.	
26	2. Respondent Sigurd Anderson is C	ORDERED to appear before Revenue Agent Sarah Ho,
27	or any other proper officer or employee of the IRS, at such time and place as may be set by Revenue	
28	Agent Ho or her designee, and produce the docu	ments and give the testimony called for by the terms of

the summons dated June 24, 2015, a copy of which is attached as Exhibit 2 to the United States' petition to enforce the IRS summons.

IT IS SO ORDERED.

Date: November 21, 2016

