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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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OAKLAND DIVISION

12 UNITED STATES OF AMERICA and)
 DEIRDRE GARRISON, Revenue Agent,)

13 Petitioners,)

14 v.)

15 RONALD P. GOLDMAN,)

16 Respondent.)

17)
 18 UNITED STATES OF AMERICA and)
 DEIRDRE GARRISON, Revenue Agent,)

19 Petitioners,)

20 v.)

21 JANA W. GOLDMAN aka Janna W.)
 Goldman,)

22 Respondent.)

23)

**JOINT STIPULATION TO FURTHER
 CONTINUE ENFORCEMENT
 PROCEEDING and [proposed]
 ORDER**

Case No. 09-0313-WDB

Case No. 09-0312-WDB

24 _____ The parties hereby agree and stipulate, subject to the Court’s approval, as follows:

25 The parties have reached a tentative settlement which they anticipate will resolve both
 26 above-captioned summons enforcement proceedings in their entirety. By prior Order entered
 27 June 8, 2009, this Court granted the parties’ joint request to continue these actions to July 13,
 28 2009, in order to enable the parties to agree upon the tax computations necessary to reach a

1 final settlement. Due to scheduling issues of IRS personnel necessary to prepare these tax
2 computations, the parties request an additional 30 days, to August 10, 2009, to reach a final
3 settlement and dismiss these proceedings.

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5 Respectfully submitted,

6 JOSEPH P. RUSSONIELLO
7 United States Attorney

8 Dated: 7/2/09

/s/ Cynthia Stier
9 CYNTHIA STIER
10 Assistant U.S. Attorney

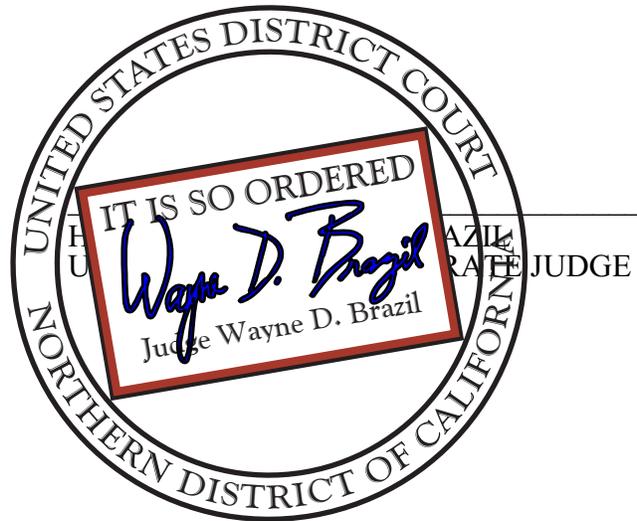
11 Attorneys for Petitioners

12 Dated: 7/2/09

/s/ Martin Schainbaum
13 MARTIN SCHAINBAUM
14 Counsel for Respondents

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16 Pursuant to the above representations and stipulation, it is hereby ORDERED that the
17 proceedings in these matters are continued to August 10, 2009.

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21 Dated: 7/6/2009



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28 Joint Stipulation to Further
Continue Enforcement Proceeding
and [proposed] Order,
Case Nos. 09-0313-WDB and
09-0312-WBD