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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,

12 Petitioner,

13 v.

14 ADAM C. CRONEY,

15 Respondent.

No. 16-cv-00315-KAW

ORDER TO SHOW CAUSE RE  
ENFORCEMENT OF INTERNAL  
REVENUE SERVICE SUMMONS

AS MODIFIED

Re: Dkt. No. 1

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17 Before the Court is a verified petition to enforce a summons of the Internal Revenue Service.  
18 Good cause having been shown by Petitioner, IT IS HEREBY ORDERED that respondent ADAM C.  
19 CRONEY, appear before this Court on the **April 7, 2016** at 11:00 AM in Courtroom 4, 3rd Floor,  
20 United States District Court, 1301 Clay Street, Oakland, California, and show cause why he should not  
21 be compelled to appear and provide documents and testimony as required by the summons served upon  
22 respondent on December 1, 2014.

23 IT IS FURTHER ORDERED that Petitioner serve a copy of this Order to Show Cause, together  
24 with a copy of the aforesaid petition, upon Respondent in accordance with Rule 4 of the Federal Rules  
25 of Civil Procedure on or before **February 24, 2016**, fourteen (14) days before the response deadline  
26 specified below.

27 IT IS FURTHER ORDERED that, on or before **March 9, 2016**, Respondent may file and serve a  
28 written response to the petition, supported by appropriate affidavit(s) or declaration(s) in conformance

1 with 28 U.S.C. § 1746, and may file any motion permitted by the Internal Revenue Code. Petitioner  
2 may file and serve a written reply to any such motion or issue raised by Respondent on or before **March**  
3 **16, 2016.**

4 All motions and issues raised by the pleadings will be considered at the hearing on this Order to  
5 Show Cause, and only those issues raised by motion or brought into controversy by the responsive  
6 pleadings and supported by affidavit(s) or declaration(s) will be considered at the hearing, and any  
7 uncontested allegation in the petition will be considered admitted.

8 IT IS SO ORDERED.

9 Dated: February 5, 2016

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KANDIS A. WESTMORE  
11 United States Magistrate Judge  
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