DAVID A. HUBBERT 1 Deputy Assistant Attorney General 2 YAEL BORTNICK Trial Attorney, Tax Division 3 U.S. Department of Justice 4 P.O. Box 683 Washington, D.C. 20044 5 202-514-6632 (v) 202-307-0054 (f) 6 Yael.Bortnick@usdoj.gov 7 **BRIAN STRETCH** 8 United States Attorney Of Counsel 9 Attorneys for Plaintiff 10 11 IN THE UNITED STATES DISTRICT COURT 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 13 14 UNITED STATES OF AMERICA, 15 Case No. 4:17-cv-3286-KAW Plaintiff, 16 STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE v. 17 MANAGEMENT CONFERENCE LISA ZAVIEH, individually, as the successor-18 in-interest to Amir Zavieh, and as the distributee 19 of the Estate of Amir Zavieh, a/k/a Allen Zavieh, 20 Defendants. 21 22 The United States of America and Lisa Zavieh, by and through undersigned counsel, 23 hereby stipulate and request that the case management conference currently scheduled for 24 January 9, 2018 at 1:30 p.m. be continued to January 23, 2018 at 1:30 p.m. (or as soon thereafter 25 as the Court is available), and state as follows: 26 27 28 STIPULATION TO CONTINUE

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CASE MANAGEMENT CONFERENCE

- 1. On June 8, 2017, the Court entered an Order Setting Initial Case Management Conference and ADR Deadlines, which set the Initial Case Management Conference for September 5, 2017, at 1:30 p.m. (Docket No. 3).
- 2. On August 29, 2017, the Court continued the Case Management Conference to January 9, 2018 at 1:30 p.m. (Docket No. 11).
- 3. Undersigned counsel for the United States has a four-day trial scheduled to begin on January 8, 2018 in Seattle, Washington, and therefore anticipates being unavailable on January 9, 2018.
- 4. Undersigned counsel for the United States has conferred with undersigned counsel for Ms. Zavieh and Ms. Zavieh agrees to this request.
- 5. This is the parties' first stipulation for a continuance of the case management conference.
- 6. As no scheduling order has yet been entered, this request will not affect the schedule for the case.

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STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE

WHEREFORE, the Parties hereby stipulate and request to continue the case management 1 conference to January 23, 2018 at 1:30 p.m. or a date thereafter convenient for the Court. 2 Respectfully submitted this 28th day of November, 2017. 3 4 DAVID A. HUBBERT Deputy Assistant Attorney General 5 /s/ Yael Bortnick 6 YAEL BORTNICK Trial Attorney, Tax Division 7 U.S. Department of Justice 8 P.O. Box 683 Washington, D.C. 20044 9 202-514-6632 (v) 202-307-0054 (f) 10 Yael.Bortnick@usdoj.gov Attorneys for the United States 11 12 **BRIAN STRETCH** United States Attorney 13 Of Counsel 14 SIDEMAN & BANCROFT LLP 15 16 /s/ Jay R. Weill JAY R. WEILL 17 Attorneys for Lisa Zavieh 18 19 20 21 22 23 24 25 26 27

STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, and for good cause shown, IT IS HEREBY

ORDERED that the case management conference is continued to January 23, 2018 at 1:30 p.m.

SO ORDERED this 29th day of November, 2017.

HON. KANDIS A. WESTMORE United States Magistrate Judge

STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE