

**U.S. Department of Justice****Tax Division**

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Please reply to: Civil Trial Section, Northern Region  
P.O. Box 55  
Ben Franklin Station  
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JAD:PAS:RBeri  
5-23-18799  
CMN 2008102648

March 17, 2010

Wolfgang H. Schubert  
25533 West Wilson Avenue  
Wauconda, Illinois 60084

Re: United States of America v. Wolfgang Schubert, et al.,  
Case No. 1:08-cv-03734; USDC Northern District of Illinois

Dear Mr. Schubert:

Based on our discussions during our meeting before the Court's last status conference and our follow-up telephone conversations, I understand that you do not intend to contest the United States' claims for unpaid income taxes and to foreclose its federal tax lien on the property commonly known as 25533 West Wilson Avenue, Wauconda, Illinois 60084 and more specifically described in Paragraphs 10 and 11 of the Second Amended Complaint (a copy of the Second Amended Complaint is enclosed herewith). I also understand that you are requesting a period of six (6) months to try to sell the property at 25533 West Wilson Avenue, Wauconda, Illinois 60084 on your own. In this regard, I have enclosed the following:

- (1) two copies of a proposed Stipulation;
- (2) a proposed Uncontested Motion for Entry of Judgment;
- (3) a proposed Judgment;
- (5) one Fedex return envelope.

Please review the proposed Stipulation, the proposed Uncontested Motion for Entry of Judgment, and the proposed Judgment. If you are satisfied that the Stipulation accurately reflects your position with regard to the claims at issue in this case and the resolution of those claims, and you do not feel that changes should be made to any of the documents, sign one copy of the proposed Stipulation and return it to me in the enclosed prepaid Fedex envelopes. Please retain the other copy for your records. Once I receive the signed stipulation, I will file it with the Court.

If you are not in agreement with any part of the proposed Stipulation or the Uncontested Motion for Entry of Judgment and proposed Judgment, or feel that the documents should be changed in any way, please contact me immediately to discuss the matter. I ask that you either return the Stipulation or contact me regarding any concerns you may have before the March 25, 2010 status hearing set in this matter.

**FILE COPY**

If you require any additional assistance regarding this matter, I may be reached by e-mail at [Raagnee.Beri@usdoj.gov](mailto:Raagnee.Beri@usdoj.gov) or by telephone at (202) 305-7917.

Sincerely yours,



RAAGNEE BERI  
Trial Attorney  
Civil Trial Section, Northern Region

Enclosures: As Stated

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