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16 United States Attorney  
17 District of Nevada  
18 Of Counsel

19 Attorneys for the United States of America

20 UNITED STATES DISTRICT COURT  
21 FOR THE DISTRICT OF NEVADA

22 THEODORE LEE,

23 Plaintiff,

24 v.

25 UNITED STATES OF AMERICA,

26 Defendant.

27 UNITED STATES OF AMERICA,

28 Counterclaim Plaintiff,

29 v.

30 THEODORE LEE,

31 Counterclaim Defendant

)  
) Civil No. 2:14-cv-00606-RCJ-PAL


)  
) **STIPULATION FOR DISMISSAL**  
) **WITH PREJUDICE [and Proposed**  
) **Order]**

1 Come now the parties, the United States of America and Theodore Lee, who hereby  
2 stipulate that the Complaint and Counterclaim in this case should be dismissed with prejudice,  
3 and each party to bear its owns attorneys' fees and costs.

4 The parties have agreed that neither party may use any part of their settlement regarding  
5 Theodore Lee's 2006 federal income tax year in any other proceeding or negotiation, whether it  
6 be administrative or judicial, for any purpose regarding any other tax liability for any other tax  
7 year of Theodore Lee.

8 Respectfully submitted this 17 day of April, 2018.

9 RICHARD E. ZUCKERMAN  
10 Principal Deputy Assistant Attorney  
11 General

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13 JEREMY N. HENDON  
14 E. CARMEN RAMIREZ  
15 Trial Attorneys, Tax Division

16 U.S. Department of Justice

17 DAYLE ELIESON  
18 United States Attorney  
19 Of Counsel

20 *Attorneys for the United States of America*

21 IT IS SO ORDERED.

22 Dated: This 23rd day of April, 2018.

23   
24 ROBERT C. JONES  
25 UNITED STATES DISTRICT JUDGE  
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**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the foregoing has been made this 19th day of April, 2018, by filing it with the Court’s CM/ECF system, which will electronically transmit it to:

George P. Kelesis  
Cook & Kelesis, Ltd.

Edward Ord  
Ord and Norman

*Counsel for the Plaintiff/Counterclaim Defendant*

/s/ E. Carmen Ramirez  
E. CARMEN RAMIREZ  
Trial Attorney, Tax Division  
U.S. Department of Justice