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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

United States of America,)
)
Plaintiff,)
)
v.)
)
Peter B. Lazare, Individually, and as Trustee of the)
Jon J. Edelman Trust; Ian Williams, as Trustee of the)
Aurora Borealis Trust; Premier Trust, Inc., as Trustee)
of the Aurora Borealis Trust,)
)
Defendants.)

Case No. 2:14-cv-01075-APG-VCF

**STIPULATION AND ORDER TO FILE
RESPONSE TO COUNTERMOTION FOR
SUMMARY JUDGMENT**

The parties filed motions for summary judgment on May 13, 2015, and filed responses on June 12, 2015. The Edelman Trust’s Taos, New Mexico property is scheduled to be sold pursuant to court order (*Acheff v. Lazare*, doc. 219) by the United States using an Internal Revenue Service Property Appraisal and Liquidation Specialist at a public auction sale on July 8, 2015. Any proceeds received by the United States will be credited to its \$1,601,000 constructive judgment against the Edelman Trust at issue in this case. On June 23, 2015, the Court entered an Order (doc. 45) approving the parties’ stipulation to extend the date to file their respective replies from June 29, 2015 to July 31, 2015. Plaintiff United States of America (“Plaintiff”), and Defendants Peter B. Lazare, Individually, and as Trustee of the Jon J.

1 Edelman Trust, and Ian Williams, as Trustee of the Aurora Borealis Trust (“Defendants”), hereby stipulate
2 to extend the date for the Plaintiff to file a response to the Defendants’ counter-motion for summary
3 judgment (doc. 44) filed on June 12, 2015, from July 6, 2015, to **July 31, 2015**.
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7 CAROLINE D. CIRAOLO
8 Acting Assistant Attorney General
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10 /s/ Waymon G. DuBose, Jr.
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23 Of Counsel:
24 DANIEL BOGDEN
25 United States Attorney
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27 **SO ORDERED.**

28 Dated: July 1, 2015.


UNITED STATES DISTRICT JUDGE

/s/ Eric R. Olsen
ERIC R. OLSEN
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Attorneys for Defendants Peter Lazare,
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Edelman Trust, and Ian Williams, as trustee for
the Aurora Borealis Trust