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 6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 PETER B. LAZARE, INDIVIDUALLY, AND  
 AS TRUSTEE OF THE JON J. EDELMAN  
 TRUST; IAN WILLIAMS, AS TRUSTEE OF  
 12 THE AURORA BOREALIS TRUST; PREMIER  
 TRUST, INC., AS TRUSTEE OF THE  
 13 AURORA BOREALIS TRUST,

14 Defendants.

CASE NO. 2:14-cv-001075-APG-VCF

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 16 **STIPULATION AND ORDER TO FILE  
 REPLIES TO RESPONSES TO MOTIONS  
 FOR SUMMARY JUDGMENT AND  
 RESPONSE TO COUNTERMOTION FOR  
 SUMMARY JUDGMENT**

17 The parties filed Motions for Summary Judgment on May 13, 2015, and filed responses on  
 18 June 12, 2015. The Edelman Trust's Taos, New Mexico property was scheduled to be sold  
 19 pursuant to court order (*Acheff v Lazare*, Doc. 219) by the United States using an Internal Revenue  
 20 Service Property Appraisal and Liquidation Specialist at a public auction sale on July 8, 2015.  
 21 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.

22 On June 24, 2015, the Court entered an Order (Doc. 45) approving the parties' stipulation  
 23 to extend the date to file their respective replies from June 29, 2015 to July 31, 2015, after the sale  
 24 date. On July 1, 2015, the Court entered an Order (Doc. 49) approving the parties' stipulation to  
 25 extend the date for the Plaintiff to file a response to the Defendants' countermotion for summary  
 26 judgment (Doc. 44) filed on June 12, 2016, from July 6, 2015, to July 31, 2015.

27 No bids were received at the public auction sale on July 8, 2015. Sale of the Edelman

1 Trust's Taos, New Mexico property pursuant to court order (*Acheff v Lazare*, Doc. 219) by the  
2 United States at a public auction sale was then re-scheduled to August 26, 2015. Therefore, on  
3 July 24, 2015, the court approved the parties' stipulation to extend the date to file their respective  
4 replies and response from July 31, 2015 until September 4, 2015, a date after the re-scheduled  
5 public auction, and the Court so ordered. (Doc. 54)

6 No bids were received at the public auction sale on August 26, 2015, but Plaintiff and  
7 Defendants have expressed interest in exploring settlement before engaging in further briefing.  
8 Plaintiff United States of America ("Plaintiff"), and Defendants Peter B. Lazare, Individually, and  
9 as Trustee of the Jon J. Edelman Trust, and Ian Williams, as Trustee of the Aurora Borealis Trust  
10 ("Defendants"), therefore, stipulate to briefly extend the date to file their respective replies and  
11 response from September 4, 2015, to September 11, 2015. Should settlement discussions

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1 prove fruitful and additional time be required to pursue settlement, the parties reserve the right to  
2 seek a further extension from the court.

3 Dated: this 3rd day of September, 2015.

Dated: this 3rd day of September, 2015.

4 GARMAN TURNER GORDON LLP

CAROLINE D. CIRAOLO  
Acting Assistant Attorney General  
Tax Division, U. S. Department of Justice

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20 IT IS HEREBY ORDERED this 3rd day of September 2015.

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UNITED STATES DISTRICT COURT JUDGE