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

9 VEG CORP. INC.,  
 10  
 11 Petitioner,  
 12 v.  
 13 UNITED STATES OF AMERICA,  
 14 Respondent.

Case No. 2:17-cv-02893-JCM-NJK

**~~PROPOSED~~ STIPULATION AND  
 ORDER TO EXTEND DEADLINE FOR  
 REPLY TO PETITIONER'S PETITION TO  
 QUASH AND TO EXTEND DEADLINES  
 FOR OPPOSITION AND REPLY  
 BRIEFING TO RESPONDENT'S  
 PETITION TO COMPEL**

**(First Request)**

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 17  
 18 Petitioner Veg. Corp., Inc. ("Veg Corp" or "Petitioner") and Respondent United States of  
 19 America ("Respondent" or "United States"), by and through their undersigned counsel, hereby  
 20 stipulate and agree to extend the time for briefing on Veg Corps' Petition to Quash Formal  
 21 Document Request and the United States' Counter Petition to Compel Compliance with Formal  
 22 Document Request.

23 The Internal Revenue Service ("IRS") is conducting an audit examination of Veg Corp's  
 24 corporate income tax return for the year 2013. In connection with the examination, the IRS issued  
 25 several Information Document Requests ("IDR") to Veg Corp. On August 21, 2017, the IRS issued a  
 26 Formal Document Request to Veg Corp under 26 U.S.C. (IRC) § 982(c)(2) in which it contended  
 27 that Veg Corp's responses to the IDRs were insufficient or incomplete. On November 17, 2017, Veg  
 28 Corp filed a petition to quash the Formal Document Request issued by the IRS to Petitioner

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1 (“Petition”). In response, on May 18, 2018, the United States filed a motion to deny the Petition, as  
2 well as a counter petition to compel compliance with the Formal Document Request (“Petition to  
3 Compel”).

4 Reply briefing to the Petition and opposition briefing to the Petition to Compel are due on  
5 June 1, 2018.

6 As a result of scheduling conflicts and the complicated nature of the subject matter, it is  
7 hereby stipulated and agreed between the parties, pending Court approval, that Veg Corp shall have  
8 up to and including **June 15, 2018** in which to file its reply to the Petition and its opposition to the  
9 United States’ Motion to Compel. Furthermore, the United States shall have up to and including  
10 **June 29, 2018** in which to file its reply to the Motion to Compel. The parties respectfully request  
11 that this Court approve the foregoing stipulation.

12 IT IS SO STIPULATED.

13 DATED this 25th day of May, 2018

DATED this 25th day of May, 2018

14 /s/ DONALD L. PRUNTY  
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23 **ORDER**

24 **IT IS HEREBY ORDERED**

25 DATED May 29, 2018

26  
27   
28 **UNITED STATES DISTRICT COURT JUDGE**