1 2 3 4	RICHARD E. ZUCKERMAN Principal Deputy Assistant Attorney General RICK WATSON Trial Attorney, Tax Division U.S. Department of Justice P.O. Box 683			
5	Washington, D.C. 20044 202-353-0300 (v)			
6	202-307-0054 (f) Rickey.Watson@usdoj.gov			
7	Attorneys for United States			
8	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA			
10	UNITED STATES OF AMERICA,)		
11	*) Case No	. 2:17-cv-3048-GWN-DJA	
12	Plaintiff,	,	MOTION TO VACATE AND	
13	v.) RESET) DEADL	PRETRIAL ORDER INE	
14	ESTATE OF SANDRA DE FORREST)		
15 16	Defendant.))))		
17 18	The United States of America and Defendant Estate of Sandra De Forrest ("the parties"),			
19	by and through their undersigned counsel, hereby move the Court to vacate and reset the deadline to submit a proposed pretrial order in this case for at least 60 days. For the reasons set forth below, the parties submit that good cause exists for such action.			
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21				
22	1. On January 13, 2020, the Defendant submitted a settlement offer to the United			
23	States. Due to the amount at issue in this case, that settlement offer must be reviewed by senior Department of Justice and IRS officials.			
24				
- '	Joint Motion to Vacate and Reset Pretrial Order Deadline		U.S. DEPARTMENT OF JUSTICE Tax Division, Western Region P.O. Box 683 Washington, D.C. 20044 Telephone: 202-353-0300	

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- 2. On May 31, 2020, while Defendant's settlement offer was still under consideration by the Department, this Court ordered the parties to submit a proposed pretrial order by June 30, 2020. Dkt. # 52.
- 3. On June 12, 2020, after further settlement discussions between the parties, the Defendant submitted a revised formal settlement offer to the United States. Due to the amount at issue in this case, that settlement offer must be reviewed by senior Department of Justice and IRS officials prior to being accepted by the Department. That review will not be completed by June 30, 2020.
- 4. Granting this motion would permit the parties to attempt to resolve this case without further litigation expense, thereby conserving the resources of the parties and the Court.
- 5. Granting the motion will not impact any other deadline in this case. Therefore, this requested extension will not prejudice the timely, orderly, efficient resolution of this case.

WHEREFORE, the parties hereby move the Court to vacate the deadline to submit a proposed pretrial order and reset it to a date no sooner than 60 days from the date of such action.

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Telephone: 202-353-0300

1	Dated: June 26, 2020.		
2	Respectfully submitted,		
3	RICHARD E. ZUCKERMAN Principal Deputy Assistant Attorney General		
4	Finicipal Deputy Assistant Attorney General		
5	/s/Rick Watson RICK WATSON		
	Trial Attorney, Tax Division		
6	U.S. Department of Justice		
7	Counsel for the United States		
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12	/s/Brian C. McManus		
	BRIAN C. MCMANUS, ESQ.		
13	(Pro Hac Vice)		
14	MIRIAM L. FISHER, ESQ. (Pro Hac Vice)		
14	Latham & Watkins LLP		
15	555 Eleventh Street, NW		
	Suite 1000		
16	Washington, D.C. 20004-1304		
17	Attorneys for Sandra J. de Forrest		
18	<u>ORDER</u>		
19	IT IS HEREBY ORDERED that the above Joint Motion to Vacate and Reset Pretrial		
20	Order Deadline, (ECF No. 53), is GRANTED . The parties shall submit a proposed joint pretrial		
	order by August 31, 2020.		
21	DATED this $\frac{1}{}$ day of July, 2020.		
22			
23	_ (Server,		
23	Gloria M. Navarro, District Judge		
24	United States District Court		
	Joint Motion to Vacate and Reset Pretrial Order Deadline 3 U.S. DEPARTMENT OF JUSTICE Tax Division, Western Region		

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