

Patrick J. Boyle (NJ Bar 036081997)  
VENABLE LLP  
Rockefeller Center  
1270 Avenue of the Americas  
24th Floor  
New York, New York 10020  
(212) 307-5500 (telephone)  
(212) 307-5598 (facsimile)  
[PBoyle@Venable.com](mailto:PBoyle@Venable.com)  
*Attorneys for Petitioner*  
*Chronic Disease Fund, Inc.*

KARI M. LARSON  
Senior Litigation Counsel  
KAVITHA BONDADA  
Trial Attorney  
U.S. Department of Justice, Tax Division  
Post Office Box 227  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 616-3822  
(202) 307-6536  
Fax: (202) 514-6866  
Email: [Kari.M.Larson@usdoj.gov](mailto:Kari.M.Larson@usdoj.gov)  
[kavitha.bondada@usdoj.gov](mailto:kavitha.bondada@usdoj.gov)  
*Counsel for Respondent United States of America*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK VICINAGE**

CHRONIC DISEASE FUND, INC.,

Petitioner,

--against--

UNITED STATES OF AMERICA,

Respondent.

Civil Action No. 17-1082-JMV-JBC

**~~PROPOSED~~ ORDER GRANTING JOINT MOTION AND STIPULATION FOR STAY  
OF PETITION AND MOTION TO ENFORCE**

Upon consideration of the Joint Motion and Stipulation for a Stay (the "Joint Motion") and for good cause shown, it is on this 27<sup>th</sup> day June, 2017, ORDERED that the Joint Motion is GRANTED. The above-captioned action shall be stayed for 90 days while the parties conduct settlement negotiations arising out of the Petition [ECF No. 1] and Motion to Enforce [ECF No. 6].

On or before September 15, 2017, the Parties shall file a joint status report stating whether: a) the stay should remain in place, in which case the Parties will identify the further length of time for which they believe a stay is appropriate; or b) the stay shall be lifted. Should the controversy be resolved in the interim, the Parties shall advise the Court, and CDF shall withdraw its petition.

The motion to enforce [Docket Entry No. 6] shall be administratively terminated. Said motion shall be re-filed, if and when the stay is lifted.

BY THE COURT:



The Hon. James B. Clark III, U.S.D.J.  
U.S.M.J.

[This Order terminates Docket Entry Nos. 6 and 8.]