**U.S. Department of Justice**

*United States Attorney
Southern District of New York*

MEMO ENDORSED

*86 Chambers Street
New York, New York 10007*

July 25, 2024

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

DOC#: _____
DATE FILED: July 26, 2024

By ECF

Hon. Andrew L. Carter, Jr.
United States Courthouse
40 Foley Square Street
New York, NY 10007

Re: *Jordan-Rowell v. United States, 23 CV 2155 (ALC)*

Dear Judge Carter:

In this action, *pro se* plaintiff Janessa Jordan-Rowell seeks a refund of purportedly withheld taxes paid to the Internal Revenue Service (“IRS”) for the tax years 2019 and 2021, in the amounts of \$15,468 and \$2,319,792 respectively, as well as additional damages of one billion dollars from the IRS for the disallowance of her administrative refund claims. We write respectfully concerning the Government’s motion to dismiss and for summary judgment which was due on July 24. Five of the six documents submission in support of the motion – the Rule 56.1 Statement, Declaration of Byron Huang with exhibits 1-50, Notice of Motion, Notice to Pro Se Who Opposes a Motion for Summary Judgment, and Notice to Pro Se Litigant Who Opposes a Motion to Dismiss – were docketed on July 24. The sixth document, the supporting memorandum of law, could not be filed before midnight. I write respectfully to request that the Court authorize the Government to file the memorandum of law and accept it *nunc pro tunc* to July 24. I have been unable to contact Plaintiff to request her consent.

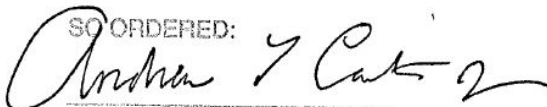
I thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for the United States

By: /s/ Brandon Cowart
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cc: Plaintiff (by certified mail)

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

July 26, 2024
New York, NY