UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

FIRST NORTHERN BANK & TRUST COMPANY, FORMERLY THE FIRST NATIONAL BANK OF PALMERTON,

CIVIL ACTION NO. 3:13-CV-01446

Plaintiff

(MEHALCHICK, M.J.)

v.

THE UNITED STATES OF AMERICA (INTERNAL REVENUE SERVICE),

Defendant

ORDER

AND NOW, this 20th day of June, 2014, for the reasons set forth in the Memorandum filed concurrently herewith, it is hereby ORDERED as follows:

- 1. Plaintiff's motion for summary judgment (Doc. 16) is **DENIED**.
- 2. Defendant's motion for summary judgment (Doc. 17) is **GRANTED**.
- 3. Judgment is entered in favor of the Defendant.
- 4. The Clerk of Court is directed to close this case.

s/Karoline Mehalchick Dated: June 20, 2014

KAROLINE MEHALCHICK

United States Magistrate Judge