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5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 KOMRON M. ALLAHYARI and
12 SHAUN ALLAHYARI,

Defendants.

C17-668 TSZ

MINUTE ORDER

13 The following Minute Order is made by direction of the Court, the Honorable
14 Thomas S. Zilly, United States District Judge:

15 (1) Defendant Shaun Allahyari's Motion, docket no. 91, for Leave to File Short
16 Post-Trial Brief re 26 U.S.C. § 6323, is DENIED. The issue was identified in the Pretrial
17 Order (docket no. 85) as a claim, *see* Pretrial Order at pages 1-2, and as a defense, *see id.*
18 at pages 2-3; discussed in the Government's Motion for Summary Judgment at 26-29 of
19 32 (docket no. 41); and addressed further in Defendant's Supplemental Trial Brief at 8-10
20 of 16 (docket no. 86). The issue has been fully briefed and no further briefing regarding
21 the application of 26 U.S.C. § 6323 will be allowed.

22 (2) The Clerk is directed to send a copy of this Minute Order to all counsel of
23 record.

Dated this 10th day of September, 2018.

William M. McCool

Clerk

s/Karen Dews

Deputy Clerk