United State	tes of America v. Estate of Dennis J. Johnson et al			
	Case 2:18-cv-00045-RSM Document 27 Filed 07/22/21 Page 1 of 2			
1	Honorable Ricardo S. M	Iartinez		
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6	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON			
7	AT SEATTLE			
8	UNITED STATES OF AMERICA,) Case No. 2:18-cv-00045-RSM			
0))			
9	Plaintiff, ORDER GRANTING UNITED STATES' MOTION FOR SUMM			
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11) ESTATE OF DENNIS J. JOHNSON;)			
11	and JODY ANN FITTS, as Personal)			
12				
13	Dennis J. Johnson,			
14	Defendant.			
14)			
15	Upon consideration of the United States' Motion for Summary Judgment, and any			
16	response and reply thereto, the Court finds that for reasons stated in the United States' Motion,			
17	there is no genuine dispute of material fact, and the United States is entitled to judgment a	there is no genuine dispute of material fact, and the United States is entitled to judgment as a		
18	matter of law. Accordingly, the United States' Motion is hereby GRANTED.			
19	The Clerk of the Court is directed to enter judgment against the Estate of Dennis J.			
20	Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, as			
21	follows:			
22	Judgment is hereby entered in favor of the United States and against the Estate of Dennis			
23	J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, for			
24	Order Granting U.S. Motion for Summary 1 Judgment (Case No. 2:18-cv-00045-RSM) U.S. DEPARTMENT OF JUS Tax Division, Western Region P.O. Box 683 Washington, D.C. 20044 Telephone: 202-307-6547	STICE		

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unpaid federal income tax liabilities for the years 2008 through 2012 in the amount of

\$498,706.40, plus interest and other statutory additions accruing from June 18, 2021 as provided

by law under 28 U.S.C. § 1961(c) and 26 U.S.C. §§ 6601, 6621, and 6622.

IT IS SO ORDERED.

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DATED this 22nd day of July, 2021.

RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE

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12	Presented by:	
13	DAVID A. HUBBERT Acting Assistant Attorney General	
14 15	/s/ Jennifer Y. Golden JENNIFER Y. GOLDEN Trial Attorney, Tax Division	
16	U.S. Department of Justice P.O. Box 683, Ben Franklin Station	
17	Washington, D.C. 20044	
18	Tel: (202) 307-6547 Fax: (202) 307-0054 Jennifer.Y.Golden@usdoj.gov	
19		
20	Attorneys for the United States of America	
21		
22		
23		
24	Order Granting U.S. Motion for Summary 2 Judgment (Case No. 2:18-cv-00045-RSM) U.S. DEPARTMENT OF JUS Tax Division, Western Region P.O. Box 683 Washington, D.C. 20044 Telephone: 202-307-6547	TICE