

Honorable Ricardo S. Martinez

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ESTATE OF DENNIS J. JOHNSON;)
and JODY ANN FITTS, as Personal)
Representative of the Estate of)
Dennis J. Johnson,)
)
Defendant.)
_____)

Case No. 2:18-cv-00045-RSM
ORDER GRANTING UNITED STATES' MOTION FOR SUMMARY JUDGMENT

Upon consideration of the United States' Motion for Summary Judgment, and any response and reply thereto, the Court finds that for reasons stated in the United States' Motion, there is no genuine dispute of material fact, and the United States is entitled to judgment as a matter of law. Accordingly, the United States' Motion is hereby GRANTED.

The Clerk of the Court is directed to enter judgment against the Estate of Dennis J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, as follows:

Judgment is hereby entered in favor of the United States and against the Estate of Dennis J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, for

1 unpaid federal income tax liabilities for the years 2008 through 2012 in the amount of
2 \$498,706.40, plus interest and other statutory additions accruing from June 18, 2021 as provided
3 by law under 28 U.S.C. § 1961(c) and 26 U.S.C. §§ 6601, 6621, and 6622.

4 IT IS SO ORDERED.

5 DATED this 22nd day of July, 2021.

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9 RICARDO S. MARTINEZ
10 CHIEF UNITED STATES DISTRICT JUDGE

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12 Presented by:

13 DAVID A. HUBBERT
14 Acting Assistant Attorney General

15 /s/ Jennifer Y. Golden
16 JENNIFER Y. GOLDEN
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