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15 *Of Counsel*

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

29 UNITED STATES OF AMERICA,
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31 Plaintiffs,
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33 v.

34 JAMES LESLIE READING, CLARE L.
35 READING, FOX GROUP TRUST,
36 MIDFIRST BANK, CHASE, FINANCIAL
37 LEGAL SERVICES, STATE OF ARIZONA
38
39 Defendants.

Civ. No. 11-698-PHX-FJM

**STIPULATION REQUESTING AN
EXTENSION OF THE RULE 26(a)(3)
DISCLOSURE, DISCOVERY AND
DISPOSITIVE MOTION DEADLINES
SET FORTH IN THE SEPTEMBER 2,
2011 SCHEDULING ORDER**

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The United States of America (“United States”), the plaintiff herein and the remaining defendants, MidFirst Bank (“MidFirst”), the State of Arizona, James and Clare Reading and the Fox Group Trust hereby request the Court to extend the Rule 26(a)(3) disclosure, discovery cutoff and dispositive motion deadlines that are set forth in the September 2, 2011 scheduling order for sixty (60) days. The parties are *not* seeking through this stipulation to extend the joint proposed pretrial order due date of September 28, 2012 or the subsequent dates set forth in the scheduling order.

1 The reason for the request is that the parties have been mainly focused on trying to informally
2 resolve some of the issues in this case without the Court's intervention. *See e.g.*, the Stipulations
3 filed with the Court on October 3, 2011, February 6, 2012, February 21, 2012, February 24, 2012 and
4 February 27, 2012. Also, there are various remaining issues that are complicated in nature and the
5 parties will continue to try to narrow them without the Court's intervention. The additional time will
6 help the parties in that regard.

7 This is the first request for extension of the referenced deadlines and this stipulation is not
8 meant to unnecessarily delay this proceeding.

9 If the Court permits the additional time, the extended Rule 26(a)(3) disclosure, discovery and
10 dispositive deadlines will be as follows:

- 11 – Rule 26(a)(3) disclosures: May 11, 2012;
- 12 – Discovery deadline: June 11, 2012; and
- 13 – Dispositive Motion filing deadline: July 10, 2012.

14 A proposed order consistent with this stipulation is lodged herewith.

15 Dated this 28th day of February, 2012.

16
17 JOHN A. DICICCO
Principal Deputy Assistant Attorney
General, Tax Division
18 U.S. Department of Justice

19
20 By: /s/ Charles M. Duffy
CHARLES M. DUFFY
21 Trial Attorney, Tax Division

22 Of Counsel:

23 ANN SCHEEL
Acting United States Attorney
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of February, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and certify that I have mailed by U.S. Postal Service to the foregoing:

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39 Defendants.

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**ORDER EXTENDING CERTAIN DATES
IN THE SCHEDULING ORDER**

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- Rule 26(a)(3) disclosures: May 11, 2012;
- Discovery deadline: June 11, 2012; and

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– Dispositive Motion filing deadline: July 10, 2012.

IT IS SO ORDERED,

Dated this ____ day of _____, 2012.

FREDERICK J. MARTONE
United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of February, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and certify that I have mailed by U.S. Postal Service to the foregoing:

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