

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:24-cv-00545-RDM**

RIM ROCK AGGREGATES LLC et al v. U.S. INTERNAL  
REVENUE SERVICE  
Assigned to: Judge Randolph D. Moss  
Cause: 05:552 Freedom of Information Act

Date Filed: 02/27/2024  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff****RIM ROCK AGGREGATES LLC**

represented by **Rod J. Rosenstein**  
KING & SPALDING  
1700 Pennsylvania Ave NW  
Suite 200  
Washington, DC 20006  
202-626-9220  
Email: [rrosenstein@kslaw.com](mailto:rrosenstein@kslaw.com)  
*ATTORNEY TO BE NOTICED*

**Plaintiff****TOP ROPE HOLDINGS LLC**

represented by **Rod J. Rosenstein**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

V.

**Defendant****U.S. INTERNAL REVENUE  
SERVICE**

represented by **Anna Miller**  
DOJ-TAX  
Tax Division  
P.O. Box 227  
Washington, DC 20044  
202-257-7595  
Email: [anna.a.miller@usdoj.gov](mailto:anna.a.miller@usdoj.gov)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
02/27/2024	<u>1</u>	COMPLAINT against U.S. INTERNAL REVENUE SERVICE ( Filing fee \$ 405 receipt number ADCDC-10718065) filed by RIM ROCK AGGREGATES LLC, TOP ROPE HOLDINGS LLC. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons IRS, # <u>3</u> Summons DOJ, # <u>4</u> Summons USAO)(Rosenstein, Rod) (Entered: 02/27/2024)
02/27/2024	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by RIM ROCK AGGREGATES LLC, TOP ROPE HOLDINGS LLC (Rosenstein, Rod) (Entered: 02/27/2024)
02/28/2024		Case Assigned to Judge Randolph D. Moss. (zed) (Entered: 02/28/2024)
03/01/2024	<u>3</u>	SUMMONS (3) Issued Electronically as to U.S. INTERNAL REVENUE SERVICE, U.S. Attorney and U.S. Attorney General. (Attachment: # <u>1</u> Notice and Consent)(zed) (Entered: 03/01/2024)
03/04/2024	<u>4</u>	STANDING ORDER: The parties are hereby ORDERED to comply with the directives set forth in the attached Standing Order. See document for details. Signed by Judge Randolph D. Moss on 3/4/24. (lcrdm2) (Entered: 03/04/2024)
03/21/2024	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. U.S. INTERNAL REVENUE SERVICE served on 3/4/2024 (Rosenstein, Rod) (Entered: 03/21/2024)

		03/21/2024)
03/21/2024	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 3/12/2024. (Rosenstein, Rod) (Entered: 03/21/2024)
03/21/2024	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 3/4/2024. Answer due for ALL FEDERAL DEFENDANTS by 4/3/2024. (Rosenstein, Rod) (Entered: 03/21/2024)
04/03/2024	<u>8</u>	ANSWER to Complaint by U.S. INTERNAL REVENUE SERVICE.(Miller, Anna) (Entered: 04/03/2024)
04/04/2024		MINUTE ORDER: It is hereby ORDERED that, on or before May 3, 2024, the parties shall confer and file a joint status report addressing (1) any documents still to be produced pursuant to FOIA; (2) an anticipated schedule for processing and producing any such documents; and (3) any substantive areas of disagreement between the parties. It is further ORDERED that the parties shall appear for an Initial Scheduling Conference on May 10, 2024, at 11:30 a.m., in Courtroom 8. Signed by Judge Randolph D. Moss on 4/4/24. (lcrdm2) (Entered: 04/04/2024)
05/03/2024	<u>9</u>	Joint STATUS REPORT <i>and Motion to Cancel Initial Scheduling Conference</i> by U.S. INTERNAL REVENUE SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(Miller, Anna) (Entered: 05/03/2024)
05/03/2024	<u>10</u>	MOTION for Order to Cancel by U.S. INTERNAL REVENUE SERVICE. (See Docket Entry <u>9</u> to view document) (zjm) (Entered: 05/03/2024)
05/03/2024		MINUTE ORDER: In light of the parties' joint status report, Dkt. <u>9</u> , it is hereby ORDERED that the Initial Scheduling Conference set for May 10, 2024, is VACATED. It is further ORDERED that the parties shall file a further joint status report on or before June 3, 2024. Signed by Judge Randolph D. Moss on 5/3/24. (lcrdm2) (Entered: 05/03/2024)
06/03/2024	<u>11</u>	Joint MOTION for Extension of Time to File <i>Joint Status Report</i> by U.S. INTERNAL REVENUE SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(Miller, Anna) (Entered: 06/03/2024)
06/04/2024		MINUTE ORDER: Upon consideration of the parties' Joint Motion for Extension of Time, Dkt. <u>11</u> , it is hereby ORDERED that the motion is GRANTED. The parties shall file their joint status report on or before June 17, 2024. Signed by Judge Randolph D. Moss on 6/4/24. (lcrdm2) (Entered: 06/04/2024)
06/17/2024	<u>12</u>	Joint STATUS REPORT by U.S. INTERNAL REVENUE SERVICE. (Miller, Anna) (Entered: 06/17/2024)
06/20/2024		MINUTE ORDER: Upon consideration of the parties' Joint Status Report, Dkt. <u>12</u> , it is hereby ORDERED that the parties shall file a further joint status report on or before July 17, 2024. Signed by Judge Randolph D. Moss on 6/20/24. (lcrdm2) (Entered: 06/20/2024)
07/17/2024	<u>13</u>	Joint STATUS REPORT by U.S. INTERNAL REVENUE SERVICE. (Miller, Anna) (Entered: 07/17/2024)
07/17/2024		MINUTE ORDER: Upon consideration of the parties' Joint Status Report, Dkt. <u>13</u> , it is hereby ORDERED that the parties file a further joint status report on or before August 16, 2024. Signed by Judge Randolph D. Moss on 7/17/24. (lcrdm2) (Entered: 07/17/2024)
08/16/2024	<u>14</u>	Joint STATUS REPORT by U.S. INTERNAL REVENUE SERVICE. (Miller, Anna) (Entered: 08/16/2024)
08/20/2024		MINUTE ORDER: Upon consideration of the parties' Joint Status Report, Dkt. <u>14</u> , it is hereby ORDERED that the parties shall submit a further Joint Status Report on or before August 30, 2024. Signed by Judge Randolph D. Moss on 8/20/2024. (lcrdm2) (Entered: 08/20/2024)

08/30/2024	<u>15</u>	Joint STATUS REPORT by U.S. INTERNAL REVENUE SERVICE. (Miller, Anna) (Entered: 08/30/2024)
08/30/2024		MINUTE ORDER: Upon consideration of the parties' joint status report, Dkt. <u>15</u> , it is hereby ORDERED that the parties shall submit a further joint status report on or before September 6, 2024. Signed by Judge Randolph D. Moss on 8/30/2024. (lcrdm2) (Entered: 08/30/2024)
09/06/2024	<u>16</u>	Joint STATUS REPORT by U.S. INTERNAL REVENUE SERVICE. (Miller, Anna) (Entered: 09/06/2024)
09/11/2024		MINUTE ORDER: Upon consideration of the parties' joint status report, Dkt. <u>16</u> , it is hereby ORDERED that the parties shall submit a further joint status report on or before November 1, 2024, and shall file further joint status reports every 60 days thereafter. Signed by Judge Randolph D. Moss on 9/11/2024. (lcrdm2) (Entered: 09/11/2024)