

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:96-cv-02285-CKK**

TAX ANALYSTS v. IRS
Assigned to: Judge Colleen Kollar-Kotelly
Demand: \$0
Cause: 05:552 Freedom of Information Act

Date Filed: 10/02/1996
Date Terminated: 03/26/2001
Jury Demand: None
Nature of Suit: 895 Freedom of Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

TAX ANALYSTS

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V.

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Date Filed	#	Docket Text
10/02/1996	1	COMPLAINT filed by plaintiff TAX ANALYSTS (bm) (Entered: 10/03/1996)
10/02/1996		SUMMONS (3) issued to federal party federal defendant IRS, and non-parties: U.S. Attorney and U.S. Attorney General. (bm) (Entered: 10/03/1996)
10/22/1996	2	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 10/7/96 upon federal defendant IRS (ks) (Entered: 10/23/1996)
10/22/1996	3	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed upon U.S. Attorney General on 10/4/96 (ks) (Entered: 10/23/1996)
10/22/1996	4	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed upon U.S. Attorney on 10/2/96; Exhibits (2). (ks) (Entered: 10/23/1996)
11/04/1996	5	ANSWER TO COMPLAINT [1-1] by federal defendant IRS . (ks) (Entered: 11/05/1996)
11/26/1996	6	MEET AND CONFER STATEMENT/REPORT PURSUANT TO L.R. 206(d) filed by plaintiff TAX ANALYSTS, federal defendant IRS . (ks) (Entered: 11/27/1996)
12/02/1996	7	SCHEDULING ORDER by Judge Thomas F. Hogan Case assigned to the Standard track (track two). , motions for summary judgment due 8/2/97 ; response to motion for summary judgment due 9/2/97; replys motion for summary judgment due 9/23/97 ; mutual disclosures under FRCP 26(a)(1) shall be filed by 1/15/97; setting forth instructions to Counsel. (N) (ks) (Entered: 12/02/1996)
01/15/1997	8	MOTION filed by federal defendant IRS for revised Scheduling order ; Decaration (1); Attachments. (ks) (Entered: 01/16/1997)

01/16/1997	9	RULE 26(a)(1) DISCLOSURE STATEMENT filed by plaintiff TAX ANALYSTS (ks) (Entered: 01/17/1997)
01/17/1997	10	ORDER by Judge Thomas F. Hogan : granting motion for revised Scheduling order [8-1] by IRS discovery closes 7/29/97 ; motion for summary judgment due 10/1/97 ; response to motion for summary judgment due 11/3/97; reply to motion for summary judgment due 11/24/97 (N) (ks) (Entered: 01/21/1997)
04/28/1997		REASSIGNMENT OF CIVIL CASE from Judge Hogan to Judge Colleen Kollar-Kotelly by direction of the Calendar Committee. Emergency matters will continue to be handled by Judge Hogan until Judge Kollar-Kotelly takes the oath of office. (N) (ks) (Entered: 04/30/1997)
05/20/1997	11	JOINT MOTION by plaintiff TAX ANALYSTS, federal defendant IRS for approval of stipulation revising scheduling Order. (ks) (Entered: 05/21/1997)
06/20/1997	12	ORDER by Judge Colleen Kollar-Kotelly : granting as to parts I, II, and III of the stipulation, denying as to part IV of the stipulation, joint motion for approval of stipulation revising scheduling Order [11-1]; discovery closes 11/14/97 motions for summary judgment due 12/15/97; oppositions to motions for summary judgment due 1/5/98; replies to motion for summary judgment due 1/12/98 ; parties shall adhere to requirement of the Court; Attachment (1) (N) [see order for details] (dbw) Modified on 06/20/1997 (Entered: 06/20/1997)
09/18/1997	13	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS for a new schedule for completing this case (JMF) (Entered: 09/19/1997)
09/22/1997	14	ORDER by Judge Colleen Kollar-Kotelly : discovery closes 12/15/97; motion for summary judgment due 2/15/98; response to motion for summary judgment due 3/15/98; reply motion for summary judgment due 4/1/98 (N) (dbw) (Entered: 09/22/1997)
01/23/1998	15	MOTION filed by plaintiff TAX ANALYSTS to compel production of documents ; exhibits (4) (tlh) (Entered: 01/26/1998)
02/05/1998	16	MEMORANDUM by federal defendant IRS in opposition to motion to compel production of documents [15-1] by TAX ANALYSTS; exhibits (6) (tlh) (Entered: 02/06/1998)
02/10/1998	17	NOTICE OF WITHDRAWAL of motion to compel production of documents [15-1] by TAX ANALYSTS (tlh) (Entered: 02/11/1998)
02/13/1998	18	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS for leave to file depositions and exhibits (st) (Entered: 02/17/1998)
02/13/1998	19	MOTION filed by plaintiff TAX ANALYSTS for summary judgment exhibits (12) (st) (Entered: 02/17/1998)
02/17/1998	20	MOTION filed by federal defendant IRS for summary judgment pursuant to FRCP 56 and Federal Local Court Rule 108(h) in its favor with respect to plaintiff's claims for relief under the FOIA Act ; exhibits (59); declarations (10); appendices (7) (tlh) (Entered: 02/18/1998)
02/24/1998	22	MEMORANDUM by federal defendant IRS in support of motion for summary judgment pursuant to FRCP 56 and Federal Local Court Rule 108(h) in its favor with respect to plaintiff's claims for relief under the FOIA Act [20-1] by IRS; exhibits (11) (tlh) (Entered: 02/25/1998)
02/25/1998	21	ORDER by Judge Colleen Kollar-Kotelly : granting motion for leave to file depositions and exhibits [18-1] by TAX ANALYSTS (N) (adc) (Entered: 02/25/1998)
03/09/1998	23	ERRATA by plaintiff TAX ANALYSTS to file second page of the table of contents of Tax Analysts memorandum of points and authorities in support of motion for summary judgment (tlh) (Entered: 03/10/1998)
03/13/1998	24	RESPONSE by plaintiff TAX ANALYSTS to order [21-1] granting motion for leave to file depositions and exhibits; depositions (8) (two boxes in basement) (tlh) (Entered: 03/16/1998)

03/13/1998	25	MOTION filed by plaintiff TAX ANALYSTS to require IRS to file and serve documents for which on 2/17/98, it waived certain FOIA exemptions; attachments (tlh) (Entered: 03/16/1998)
03/13/1998	26	RESPONSE by plaintiff TAX ANALYSTS in opposition to motion for summary judgment pursuant to FRCP 56 and Federal Local Court Rule 108(h) in its favor with respect to plaintiff's claims for relief under the FOIA Act [20-1] by IRS; exhibits (4) (tlh) (Entered: 03/16/1998)
03/16/1998	27	RESPONSE by federal defendant IRS in opposition to motion for summary judgment [19-1] by TAX ANALYSTS; declarations (2); attachments (tlh) (Entered: 03/17/1998)
03/16/1998	33	MOTION filed by federal defendant IRS to strike appendix A & B of their statement of material facts and deposition exhibit 8 filed in support of plaintiffs motion for summary judgment [19-1] (tlh) (Entered: 03/31/1998)
03/16/1998	34	MOTION filed by federal defendant IRS for for in camera review (tlh) (Entered: 03/31/1998)
03/23/1998	28	ERRATA by plaintiff TAX ANALYSTS submitting original signature pages to the depositions filed in regards to the courts order of 2/25/98; attachments (tlh) (Entered: 03/24/1998)
03/23/1998	29	MOTION filed by plaintiff TAX ANALYSTS to reopen discovery ; attachments (tlh) (Entered: 03/24/1998)
03/23/1998	30	RESPONSE by plaintiff TAX ANALYSTS in opposition to IRS's motion to strike documents in support of appendices to their motion for summary judgment [33-1] (tlh) Modified on 03/31/1998 (Entered: 03/24/1998)
03/26/1998	31	RESPONSE by plaintiff TAX ANALYSTS in opposition to defendant's motion for in camera review (tlh) (Entered: 03/27/1998)
03/27/1998	32	MOTION filed by federal defendant IRS to extend time to 4/10/98 to respond to plaintiff's motion to require IRS to file and serve documents (tlh) (Entered: 03/30/1998)
03/30/1998	35	REPLY by federal defendant IRS to response to motion to strike appendix A & B of their statement of material facts and deposition exhibit 8 filed in support of plaintiffs motion for summary judgment [19-1] [33-1] by IRS (tlh) (Entered: 03/31/1998)
04/01/1998	36	REPLY by plaintiff TAX ANALYSTS to defendant's opposition to motion for summary judgment [19-1] by TAX ANALYSTS . (tlh) (Entered: 04/02/1998)
04/01/1998	37	MEMORANDUM by federal defendant IRS in reply to plaintiff's opposition to its motion for summary judgment; attachment (1) (tlh) (Entered: 04/02/1998)
04/01/1998	38	SUPPLEMENTAL MEMORANDUM by plaintiff TAX ANALYSTS in opposition to motion for summary judgment pursuant to FRCP 56 and Federal Local Court Rule 108(h) in its favor with respect to plaintiff's claims for relief under the FOIA Act [20-1] by IRS; attachment (tlh) (Entered: 04/03/1998)
04/02/1998	39	REPLY by federal defendant IRS in support of their motion for in camera review [34-1] (tlh) (Entered: 04/03/1998)
04/02/1998	40	MEMORANDUM by federal defendant IRS in opposition to motion to reopen discovery [29-1] by TAX ANALYSTS; attachments (tlh) (Entered: 04/03/1998)
04/06/1998	41	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS for oral hearing (tlh) (Entered: 04/07/1998)
04/14/1998	42	ORDER by Judge Colleen Kollar-Kotelly : granting motion to extend time to 4/10/98 to respond to plaintiff's motion to require IRS to file and serve documents [32-1] by IRS (N) (adc) (Entered: 04/14/1998)
04/14/1998	43	REPLY by plaintiff TAX ANALYSTS to defendant's opposition to motion to reopen discovery [29-1] by TAX ANALYSTS; exhibits (2) (tlh) (Entered: 04/15/1998)

05/11/1998	44	NOTICE OF FILING by plaintiff TAX ANALYSTS regarding this Court's decision in Tax Analysts V. IRS C.A. 94-0923 and also files plaintiff's supplemental memorandum on this Court's May 1, 1998 Opinion in the FSA case on remand; attachments (2) (tlh) (Entered: 05/12/1998)
05/14/1998	45	ERRATA by federal defendant IRS correcting exhibit 14 to the declaration of Daniel J. Wiles was inadvertently omitted from the motion for summary judgment when it was originally filed; attachment (tlh) (Entered: 05/18/1998)
09/02/1998	46	SUBSTITUTION OF COUNSEL for federal defendant IRS , substituting Michael Joseph Salem for attorney Margaret Mary Elizabeth Earnest for IRS (tlh) (Entered: 09/03/1998)
09/17/1998	47	MOTION filed by plaintiff TAX ANALYSTS for leave to file first amended complaint exhibit (First Amended Complaint) (dam) Modified on 09/18/1998 (Entered: 09/18/1998)
09/29/1998	48	RESPONSE by federal defendant IRS in opposition to motion for leave to file first amended complaint [47-1] by TAX ANALYSTS . (tlh) (Entered: 09/30/1998)
10/07/1998	49	REPLY by plaintiff TAX ANALYSTS to response to motion for leave to file first amended complaint [47-1] by TAX ANALYSTS (tlh) (Entered: 10/08/1998)
11/23/1998	50	ATTORNEY APPEARANCE for federal defendant IRS by Jason S. Zarin. (dam) (Entered: 11/24/1998)
01/13/1999	51	MOTION filed by federal defendant IRS for leave to file documents for in camera review (tlh) (Entered: 01/14/1999)
01/21/1999	52	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS to extend time to 2/9/99 to respond to defendant's motion for leave to submit documents for In Camera review (dam) (Entered: 01/25/1999)
01/25/1999	53	ORDER by Judge Colleen Kollar-Kotelly : granting motion to extend time to 2/9/99 to respond to defendant's motion for leave to submit documents for In Camera review [52-1] by TAX ANALYSTS (N) (adc) (Entered: 01/25/1999)
02/08/1999	54	JOINT MOTION by plaintiff TAX ANALYSTS, federal defendant IRS to extend time to 2/23/99 for plaintiff to respond to defendant's motion for leave to submit documents for in camera review. (zz) (Entered: 02/10/1999)
02/10/1999	55	ORDER by Judge Colleen Kollar-Kotelly : granting joint motion to extend time to 2/23/99 for plaintiff to respond to defendant's motion for leave to submit documents for in camera review. [54-1] by IRS, TAX ANALYSTS (N) (adc) (Entered: 02/10/1999)
02/18/1999	56	STIPULATION filed and fiated by Judge Colleen Kollar-Kotelly resolving in part the defendant's 1/12/99 motion for leave to submit documents for in camera review. (N) (adc) (Entered: 02/18/1999)
02/24/1999	57	STIPULATED ORDER by Judge Colleen Kollar-Kotelly : granting motion for leave to file documents for in camera review [51-1] by IRS (N) (adc) (Entered: 02/24/1999)
02/26/1999	58	FINAL STIPULATED ORDER by Judge Colleen Kollar-Kotelly : regarding in camera review (N) (adc) (Entered: 03/01/1999)
03/24/1999	59	ORDER by Judge Colleen Kollar-Kotelly : granting motion to require IRS to file and serve documents for which on 2/17/98, it waived certain FOIA exemptions; attachments [25-1] by TAX ANALYSTS; IRS shall produce, file in this court and serve on plaintiff no later than 4/23/99 the documents specified or described in Scheduled A and A-1 to plaintiff's motion (N) (adc) (Entered: 03/24/1999)
03/24/1999	60	MOTION (CONSENT) filed by federal defendant IRS to extend time to 4/2/99 to time comply with the final stipulated order regarding in camera review (tb) (Entered: 03/25/1999)
03/25/1999	61	ORDER by Judge Colleen Kollar-Kotelly : granting motion to extend time to 4/2/99 to time comply with the final stipulated order regarding in camera review [60-1] by IRS (N) (adc) (Entered: 03/26/1999)

03/29/1999	62	MOTION (CONSENT) filed by federal defendant IRS for reconsideration of order [59-1] (tb) (Entered: 03/30/1999)
03/29/1999	63	SUPPLEMENTAL MEMORANDUM by federal defendant IRS to accompany supplemental declarations of Paul F. Kugler and Philip J. Levine; exhibits (2) (tb) (Entered: 03/30/1999)
03/30/1999	64	VAUGHN INDEX by federal defendant IRS; exhibit (1) (tb) (Entered: 03/31/1999)
03/31/1999	65	STIPULATED ORDER by Judge Colleen Kollar-Kotelly : that the plaintiff's motion to require the IRS to file and server documents for which on 2/17/98, it waived certain FOIA Exemptions was resolved by stipulation on 4/10/98; that the Court's 3/24/99 order granting the motion to require the IRS to file and serve documents for which on 2/17/98, it waived certain FOIA exemptions is withdrawn. The Court notes that chamber did not receive a copy of any stipulation purportedly filed 4/10/98 either as the judge's copy or courtesy copy. (N) (dot) (Entered: 03/31/1999)
04/02/1999	66	MEMORANDUM RE: status of this case and matters outstanding for resolution by plaintiff TAX ANALYSTS; attachments (tb) (Entered: 04/05/1999)
04/05/1999	67	NOTICE OF FILING by federal defendant IRS of in camera submission (jf) (Entered: 04/06/1999)
04/06/1999	68	RESPONSE by federal defendant IRS to notice [66-1] by TAX ANALYSTS; exhibits (2) (tb) (Entered: 04/07/1999)
05/03/1999	69	MOTION (SUPPLEMENTAL) filed by plaintiff TAX ANALYSTS for partial summary judgment as to technical assistance memorandum (TAs) and legal memoranda (LMs) ; exhibits (3) (tb) Modified on 05/04/1999 (Entered: 05/04/1999)
05/07/1999	70	MOTION (UNOPPOSED) filed by federal defendant IRS to extend time to 5/26/99 to file an opposition to plaintiff's supplemental motion for summary judgment (jf) (Entered: 05/10/1999)
05/12/1999	71	ORDER by Judge Colleen Kollar-Kotelly : granting motion to extend time to 5/26/99 to file an opposition to plaintiff's supplemental motion for summary judgment [70-1] by IRS (N) (adc) (Entered: 05/12/1999)
05/25/1999	72	RESPONSE by federal defendant IRS in opposition to motion for partial summary judgment as to technical assistance memorandum (TAs) and legal memoranda (LMs) [69-1] by TAX ANALYSTS; declaration (1); exhibits (2) (tb) (Entered: 05/26/1999)
06/03/1999	73	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS to extend time to 6/15/99 to file and serve its reply to the Internal Revenue Service's opposition to plaintiff's supplemental motion for partial summary judgment as to technical assistance memoranda and legal memoranda (lkn) (Entered: 06/04/1999)
06/07/1999	74	ORDER by Judge Colleen Kollar-Kotelly : granting motion to extend time to 6/15/99 to file and serve its reply to the Internal Revenue Service's opposition to plaintiff's supplemental motion for partial summary judgment as to technical assistance memoranda and legal memoranda [73-1] by TAX ANALYSTS (N) (adc) (Entered: 06/07/1999)
06/14/1999	75	REPLY by plaintiff TAX ANALYSTS to motion for partial summary judgment as to technical assistance memorandum (TAs) and legal memoranda (LMs) [69-1] by TAX ANALYSTS; exhibits (2) (tb) (Entered: 06/15/1999)
07/14/1999	76	MOTION filed by federal defendant IRS for leave to file motion to dismiss the portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction ; (MOTION TO DISMISS) (tb) (Entered: 07/15/1999)
07/15/1999	77	ORDER by Judge Colleen Kollar-Kotelly : granting motion for leave to file motion to dismiss the portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [76-1] by IRS; the defendant has 11 days after the filing date of this Order to file an opposition to the motion to

		dismiss (N) (adc) (Entered: 07/16/1999)
07/15/1999	78	MOTION filed by federal defendant IRS to dismiss portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [1-1] (tb) (Entered: 07/19/1999)
07/20/1999	79	MOTION filed by plaintiff TAX ANALYSTS to extend time to 8/17/99 to file opposition to defendant's motion to dismiss the portions of the complaint concerning LGMS, TLBS and TAs (tb) (Entered: 07/21/1999)
07/27/1999	80	ORDER by Judge Emmet G. Sullivan: granting motion to extend time to 8/17/99 to file opposition to defendant's motion to dismiss the portions of the complaint concerning LGMS, TLBS and TAs [79-1] by TAX ANALYSTS response to motion(s) due by 8/17/99 ; (N) (dam) (Entered: 07/27/1999)
08/17/1999	81	RESPONSE by plaintiff TAX ANALYSTS in opposition to motion to dismiss portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [1-1] [78-1] by IRS; exhibit (1) (tb) (Entered: 08/17/1999)
08/25/1999	82	REPLY by federal defendant IRS to plaintiff's opposition to motion to dismiss portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [1-1] [78-1] by IRS; Attachments. (lkn) (Entered: 08/26/1999)
09/09/1999	83	STIPULATION filed and fiated by Judge Colleen Kollar-Kotelly regarding request for documents . (N) (adc) (Entered: 09/10/1999)
09/23/1999	84	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS for leave to file supplemental memorandum on defendant's motion to dismiss portions of complaint LGMS, TLBS AND TAs to the field due to lack of subject matter jurisdiction ; EXHIBIT (SUPPLEMENTAL MEMORANDUM) (tb) (Entered: 09/24/1999)
09/28/1999	85	ORDER by Judge Colleen Kollar-Kotelly : granting motion for leave to file supplemental memorandum on defendant's motion to dismiss portions of complaint LGMS, TLBS AND TAs to the field due to lack of subject matter jurisdiction [84-1] by TAX ANALYSTS (N) (adc) (Entered: 09/28/1999)
09/28/1999	87	SUPPLEMENTAL MEMORANDUM by plaintiff TAX ANALYSTS to motion to dismiss portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [1-1] [78-1] by IRS; exhibits (2) (tb) (Entered: 10/07/1999)
10/04/1999	86	STIPULATION filed and fiated by Judge Colleen Kollar-Kotelly regarding dismissal with prejudice as to the PIRs and FSA Reports, and plaintiff cannot relitigate these documents based on any other decision. (N) (dot) (Entered: 10/05/1999)
10/05/1999	88	RESPONSE by federal defendant IRS to supplemental memorandum [87-1] by TAX ANALYSTS (tb) (Entered: 10/07/1999)
10/16/1999	89	SURREPLY by plaintiff TAX ANALYSTS to motion to dismiss portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [1-1] [78-1] by IRS; (fiat) J. KOLLAR-KOTELLY (tb) (Entered: 10/19/1999)
10/22/1999	90	NOTICE OF FILING by plaintiff TAX ANALYSTS of new IRS statement accepting and implementing the "Harm Rule" (jf) (Entered: 10/25/1999)
10/25/1999	91	MOTION (UNOPPOSED) filed by federal defendant IRS for release to defendant of original deposition exhibits (tb) (Entered: 10/26/1999)
11/03/1999	<u>92</u>	ORDER by Judge Colleen Kollar-Kotelly : granting motion for release to defendant of original deposition exhibits [91-1] by IRS (N) (adc) (Entered: 11/03/1999)
03/09/2000	<u>93</u>	ORDER by Judge Colleen Kollar-Kotelly : denying motion to reopen discovery [29-1] by TAX ANALYSTS (N) (dot) (Entered: 03/09/2000)

03/31/2000	<u>94</u>	MEMORANDUM OPINION by Judge Colleen Kollar-Kotelly (N) (dot) (Entered: 03/31/2000)
03/31/2000	<u>95</u>	ORDER by Judge Colleen Kollar-Kotelly : granting motion to dismiss portions of the complaint concerning LGMS, TLBS and TAs to the field due to lack of subject matter jurisdiction [1-1] [78-1] by IRS (N) (dot) (Entered: 03/31/2000)
03/31/2000	<u>96</u>	MEMORANDUM OPINION by Judge Colleen Kollar-Kotelly (N) (dot) (Entered: 03/31/2000)
03/31/2000	<u>97</u>	ORDER by Judge Colleen Kollar-Kotelly : denying without prejudice motion to strike appendix A & B of their statement of material facts and deposition exhibit 8 filed in support of plaintiffs motion for summary judgment [19-1] [33-1] by IRS; denying motion for summary judgment [19-1] by TAX ANALYSTS, denying motion for partial summary judgment as to technical assistance memorandum (TAs) and legal memoranda (LMs) by TAX ANALYSTS, denied as moot with respect to TLBs, post-1985 LGMs, and TAs to field, denied without prejudice with respect to pre-1986 LGMs and TAs other than (a) TAs to the field and (b) TAs withheld pursuant to Exemption 5 and the attorney-client privilege; denying motion for summary judgment pursuant to FRCP 56 and Federal Local Court Rule 108(h) in its favor with respect to plaintiff's claims for relief under the FOIA Act [20-1] by IRS, denied as moot with respect to TLBs, post-1985 LGMs, and TAs to the field, denied without prejudice with respect to pre-1986 LGMs and TAs other than (a) TAs to the field and (b) TAs withheld pursuant to (i) Exemption 3 in conjunction with I.R.C. 6103 and (ii) one TA withheld pursuant to Exemption 5 and the attorney-client privilege; defendant's to file supplemental Vaughn index and renewed motion for summary judgment, plaintiff's to file combined renewed motion for summary judgment due 6/30/00; defendant's combined opposition to plaintiff's renewed motion for summary judgment and reply in support of defendant's renewed motion for summary judgment due 7/17/00, plaintiff's reply in support of plaintiff's renewed motion for summary judgment due 7/31/00 (N) (dot) (Entered: 03/31/2000)
03/31/2000	<u>98</u>	ORDER by Judge Colleen Kollar-Kotelly : granting in part, denying in part motion for leave to file first amended complaint [47-1] (N) (dot) (Entered: 03/31/2000)
04/21/2000	99	MOTION filed by plaintiff TAX ANALYSTS for clarification and amendment of Orders and opinions issued 3/31/00 ; Exhibits (8). (ks) (Entered: 04/24/2000)
05/02/2000	100	RESPONSE by federal defendant IRS to motion for clarification and amendment of Orders and opinions issued 3/31/00 [99-1] by TAX ANALYSTS (dam) (Entered: 05/03/2000)
05/23/2000	101	MOTION (UNOPPOSED) filed by federal defendant IRS to extend time to 6/6/00 to file motion for summary judgment and revised vaughn index (tb) (Entered: 05/24/2000)
05/31/2000	<u>102</u>	ORDER by Judge Colleen Kollar-Kotelly : granting motion to extend time to 6/6/00 to file renewed motion for summary judgment and revised vaughn index [101-1] by IRS; that the remaining deadlines listed in the Court's Order of March 31, 2000, be reset accordingly, one week later. (N) (dot) (Entered: 06/02/2000)
06/06/2000	103	VAUGHN INDEX by federal defendant IRS; Exhibits (2). (ks) (Entered: 06/07/2000)
06/06/2000	104	MOTION filed by federal defendant IRS for summary judgment (dam) (Entered: 06/07/2000)
06/12/2000	105	SUPPLEMENTAL MEMORANDUM by plaintiff TAX ANALYSTS to motion for clarification and amendment of Orders and opinions issued 3/31/00 [99-1] by TAX ANALYSTS (tb) (Entered: 06/13/2000)
06/20/2000	106	MOTION filed by plaintiff TAX ANALYSTS for leave to file voluminous exhibits in electronic form (tb) (Entered: 06/21/2000)
06/20/2000	107	NOTICE OF FILING RE: withdrawing portion of defendant's renewed summary judgment brief by federal defendant IRS (tb) (Entered: 06/21/2000)

07/07/2000	108	CROSS MOTIONS (RENEWED) by plaintiff TAX ANALYSTS for summary judgment ; exhibits (5) (tb) Modified on 07/08/2000 (Entered: 07/08/2000)
07/07/2000	109	RESPONSE by plaintiff TAX ANALYSTS in opposition to motion for summary judgment [104-1] by IRS . (tb) (Entered: 07/08/2000)
07/07/2000	110	VAUGHN INDEX by federal defendant IRS; exhibit (1) (tb) (Entered: 07/10/2000)
07/24/2000	111	RESPONSE by federal defendant IRS in opposition to cross motion for summary judgment [108-1] by TAX ANALYSTS . (tb) (Entered: 07/25/2000)
07/25/2000	112	SUPPLEMENTAL MEMORANDUM by federal defendant IRS in support of in opposition to response [111-1] by IRS.; exhibit (1) (dam) Modified on 07/26/2000 (Entered: 07/26/2000)
07/27/2000	113	ERRATA RE: first line of page 7 of plaintiff's renewed cross motion for summary judgment and opposition to defendant's renewed cross motion for summary judgment filed on 07/07/00 by plaintiff TAX ANALYSTS; attachment (tb) (Entered: 07/28/2000)
08/07/2000	114	REPLY by plaintiff TAX ANALYSTS to cross motion for summary judgment [108-1] by TAX ANALYSTS; exhibits (2) (tb) (Entered: 08/08/2000)
10/25/2000	115	MOTION filed by plaintiff TAX ANALYSTS for reconsideration of order [97-2] and opinion for cross-motion for summary judgment on 3/31/00 with respect to defendant's rule and legal memoranda ; exhibit (1) (cdw) Modified on 10/31/2000 (Entered: 10/26/2000)
11/06/2000	116	RESPONSE by federal defendant IRS in opposition to motion for reconsideration of order [97-2] and opinion for cross-motion for summary judgment on 3/31/00 with respect to defendant's rule and legal memoranda [115-1] by TAX ANALYSTS . (cdw) (Entered: 11/07/2000)
11/14/2000	117	REPLY by plaintiff TAX ANALYSTS to response in opposition to motion for reconsideration of order [97-2] and opinion for cross-motion for summary judgment on 3/31/00 with respect to defendant's rule and legal memoranda [115-1] by TAX ANALYSTS (cdw) (Entered: 11/15/2000)
12/05/2000	<u>118</u>	ORDER by Judge Colleen Kollar-Kotelly : granting motion for leave to file voluminous exhibits in electronic form [106-1] by TAX ANALYSTS nunc pro tunc (N) (dcn) (Entered: 12/05/2000)
01/02/2001	119	MEMORANDUM RE: notice of change in applicable law by federal defendant IRS; exhibits (2) (tb) (Entered: 01/08/2001)
01/24/2001	120	RESPONSE and memorandum on new legislation by plaintiff TAX ANALYSTS to notice of change to applicable law [119-1] by IRS; exhibits (1) (cdw) (Entered: 01/31/2001)
02/02/2001	121	REPLY by federal defendant IRS to plaintiff's memorandum and response to notice of change in applicable law [120-1] by TAX ANALYSTS; exhibits (1) (cdw) (Entered: 02/05/2001)
02/23/2001	123	STRICKENED FROM THE RECORD PURSUANT TO COURT'S STRIKING ORDER OF 03/08/01 --SURREPLY by plaintiff TAX ANALYSTS to reply [121-1] by IRS (tb) Modified on 03/12/2001 (Entered: 03/12/2001)
03/06/2001	122	MOTION filed by federal defendant IRS to strike plaintiff's response to defendant's reply to plaintiff's memorandum and response to notice of change to applicable law [120-1] (cdw) (Entered: 03/07/2001)
03/08/2001	124	ORDER by Judge Colleen Kollar-Kotelly : striking reply [123-1] by TAX ANALYSTS (N) (tb) (Entered: 03/12/2001)
03/14/2001	125	MOTION filed by plaintiff TAX ANALYSTS for reconsideration of this Court's order of 3/8/01 [124-1] (bm) (Entered: 03/15/2001)
03/20/2001	<u>126</u>	ORDER by Judge Colleen Kollar-Kotelly : that the Court will consider plaintiff TAX ANALYSTS sur-reply on that issue. The Court has also concluded that there is no further need for briefing by either party. (N) (adc) (Entered: 03/20/2001)

03/26/2001	<u>127</u>	MEMORANDUM OPINION by Judge Colleen Kollar-Kotelly (N) (dot) (Entered: 03/26/2001)
03/26/2001	<u>128</u>	ORDER by Judge Colleen Kollar-Kotelly : denying with prejudice motion for reconsideration of order [97-2] and opinion for cross-motion for summary judgment on 3/31/00 with respect to defendant's rule and legal memoranda [115-1] by TAX ANALYSTS. Plaintiff's and defendant's renewed cross-motions for summary judgment are denied in part and granted in part, as follows: defendant must release the following TAs: TR-45-0008-95, TR-45-798-93, TR-45-1000-94/Tr-45-1001-94, TR-45-1691-94, TR-45-699-93, TR-45396-92-A, TR-45-934-94, TR-45-933-94, TR-45-2233-93, TR-45-1383-94, TR-45-1974-93, TR-45-2473-93, and TR-45-2820-92. Defendant may withhold in their entirety the following TAs: TR-45-1362-93, TR-45-396-92, TR-45-1465-94, TR-45-472-93, TR-45-531-31, TR-45-304-94, TR-45-1763, TR-955-93, TR-45-307-93, TR-45-2164-93, TR-45-1642-94, TR-45-1796-93, TR-31-107-93, TR-31-87-93, TR-31-1954-94, TR-31-230-94, TR-31-2121-92, TR-31-1281-94, TR-31-1237-94, TR-31-1235-94, TR-45-155-94, TR-1011-94, TR-45-2608-93, TR-45-2535-93, TR-31-1434-92, TR-31-2162-92, CC:INTL-0902-93, and CC:INTL-0251-94. Defendant may withhold in party the following TAs: pages 1 and 2 of TR-45-396-93 and TR-45-511-93. This case is dismissed and that this is a final, appealable order. (N) (dot) (Entered: 03/26/2001)
04/03/2001	130	MOTION (CONSENT) filed by plaintiff TAX ANALYSTS to postpone filing of motion for attorney's fee until conclusion of this case after appellate review (cdw) (Entered: 04/04/2001)
04/04/2001	<u>129</u>	ORDER by Judge Colleen Kollar-Kotelly : plaintiff's consent motion for an award of attorney's fees shall be filed thirty (30) days after conclusion of all proceedings in this case after appellate review and any remand from the Court of Appeals to this court. (N) (dot) (Entered: 04/04/2001)
04/06/2001	131	MOTION filed by federal defendant IRS for reconsideration of Court's order of 3/26/01 [128-1] (cdw) (Entered: 04/10/2001)
04/18/2001	132	RESPONSE by plaintiff TAX ANALYSTS to motion for reconsideration of Court's order of 3/26/01 [128-1] [131-1] by IRS (cdw) (Entered: 04/19/2001)
04/27/2001	133	REPLY by federal defendant IRS to response in opposition to motion for reconsideration of Court's order of 3/26/01 [128-1] [131-1] by IRS (cdw) (Entered: 04/30/2001)
05/03/2001	134	MOTION filed by plaintiff TAX ANALYSTS for leave to file a response to defendant's reply to plaintiff's response to defendant's motion for reconsideration. ; EXHIBIT: Response to Defendant's Reply (hsj) (Entered: 05/07/2001)
05/21/2001	<u>135</u>	MEMORANDUM OPINION by Judge Colleen Kollar-Kotelly (N) (dot) (Entered: 05/21/2001)
05/21/2001	<u>136</u>	ORDER by Judge Colleen Kollar-Kotelly : denying with prejudice motion response [132-1] by TAX ANALYSTS. Granting in part, denying in part motion for reconsideration of Court's order of 3/26/01 [128-1] [131-1]. With respect to defendant's request that this Court reconsider its analysis of Exemption 7 threshold requirement, defendant's motion is denied; defendant shall apply the Court's legal holdings articulated in the 2000 and 2001 Orders to all the TAs at issue and withhold and disclose them in a manner consistent with the Court's holdings; defendant shall provide plaintiff with a list of all the TAs in continues to withhold, specifying for each the basis or bases for withholding, and demonstrating its application of the Court's legal holdings in its Orders. (N) (dot) (Entered: 05/21/2001)
06/29/2001	137	NOTICE OF APPEAL by plaintiff TAX ANALYSTS from order [136-1], order [128-1], order [98-1] , entered on: 5/21/01, 3/26/01 & 3/31/00; \$105.00 filing fees paid; Copies mailed to plaintiff and defendant (cjp) (Entered: 07/02/2001)
07/02/2001		TRANSMITTED PRELIMINARY RECORD on appeal [137-1] by TAX ANALYSTS to U.S. Court of Appeals (cjp) (Entered: 07/02/2001)

07/11/2001	138	NOTICE OF APPEAL by federal defendant IRS from order [136-1], entered on: 5/21/01. Copy mailed to parites. (td) (Entered: 07/12/2001)
07/12/2001		TRANSMITTED PRELIMINARY RECORD on appeal [138-1] by IRS to U.S. Court of Appeals (td) (Entered: 07/12/2001)
07/19/2001		USCA # 01-5231 assigned for appeal [138-1] by IRS (cdw) (Entered: 07/24/2001)
07/20/2001		USCA # 01-5232 assigned for appeal [138-1] by IRS (dam) (Entered: 07/23/2001)
08/21/2002	139	CERTIFIED COPY of judgment filed in USCA dated 6/14/02, on appeal [138-1] , affirming in part the judgment of USDC . , and reversing in part the judgment of USDC , and remanding for further proceedings. USCA # 01-5231 (cp) (Entered: 08/27/2002)
11/13/2002	140	NOTICE OF CHANGE OF ADDRESS by William Aaron Dobrovir representing plaintiff TAX ANALYSTS . New address: PO Box 198 Sperryville VA 22740-0198 (540)987-9114. (aet) (Entered: 11/14/2002)
11/21/2002	<u>141</u>	ORDER by Judge Colleen Kollar-Kotelly : that by no later than 12/11/02, the parties shall inform the Court of their intentions and the manner in which they wish to proceed in this case. That by no later than 12/11/02, if unable to resolve the issue presented on remand, the parties will file a proposed briefing schedule, in the event that they wish to proceed with this matter. If the case has been resolved, the plaintiff shall file a notice of dismissal with the Court. (N) (dot) (Entered: 11/21/2002)
12/11/2002	142	JOINT STATUS REPORT by plaintiff TAX ANALYSTS, federal defendant IRS pursuant to order dated 11/21/02 (aet) Modified on 12/30/2002 (Entered: 12/12/2002)
05/19/2003	<u>143</u>	ORDER by Judge Colleen Kollar-Kotelly : that this matter shall be dismissed with prejudice on 5/23/03, unless the Court hears from the parties that a briefing schedule is necessary. (N) (dot) (Entered: 05/19/2003)
05/22/2003	144	MOTION filed by plaintiff TAX ANALYSTS to compel defendant to complete its outstanding obligations in this case. (aet) (Entered: 05/28/2003)
06/04/2003	145	RESPONSE by federal defendant IRS in opposition to motion to compel defendant to complete its outstanding obligations in this case. [144-1] by TAX ANALYSTS. (aet) (Entered: 06/06/2003)
06/11/2003	146	REPLY by plaintiff TAX ANALYSTS to response in opposition to motion to compel defendant to complete its outstanding obligations in this case. [144-1] by TAX ANALYSTS (aet) (Entered: 06/12/2003)
06/17/2003	147	MOTION filed by plaintiff TAX ANALYSTS for in camera inspection (aet) (Entered: 06/18/2003)
06/20/2003	<u>148</u>	ORDER by Judge Colleen Kollar-Kotelly : granting motion for in camera inspection [147-1] by TAX ANALYSTS. IRS shall submit those 35 TAs to the court in chambers within 15 days of the date of this order. (N) (dot) (Entered: 06/23/2003)
07/08/2003	149	VAUGHN INDEX by federal defendant IRS; exhibits (3) (aet) (Entered: 07/10/2003)
03/29/2006	<u>150</u>	NOTICE OF SUBSTITUTION OF COUNSEL by David M. Katinsky on behalf of INTERNAL REVENUE SERVICE Substituting for attorney Jason S. Zarin (Katinsky, David) (Entered: 03/29/2006)
01/17/2007	<u>151</u>	MOTION to Expedite by TAX ANALYSTS. (Attachments: # <u>1</u> Exhibit # <u>2</u> Text of Proposed Order)(Hitchcock, Cornish) (Entered: 01/17/2007)
01/29/2007	<u>152</u>	RESPONSE to <i>Plaintiff's Motion for an Expedited Ruling, Statement of Nonopposition</i> filed by INTERNAL REVENUE SERVICE. (Katinsky, David) (Entered: 01/29/2007)
02/07/2007		MINUTE ORDER (PAPERLESS): The Court will release an Order and Memorandum Opinion on the pending motion on February 7, 2007. Signed by

		Judge Colleen Kollar-Kotelly on February 7, 2007. (lcckk1) (Entered: 02/07/2007)
02/07/2007	<u>153</u>	ORDER GRANTING IN PART and DENYING IN PART Plaintiff's 144 Motion to Compel Defendant Internal Revenue Service to Complete Outstanding Obligations in this Case; ORDERING that the following documents may be properly withheld by Defendant: 2 TR-45-62-93; 3 TR-45-2164-93; 4 TR-45-307-93; 5 TR-45-734-94; 8 TR-45-1482-93; 9 TR-45-1642-94; 11 TR-45-211-93; 12 TR-45-2312-93; 13 TR-45-837-94; 15 TR-45-1601-94; 17 TR-45-1280-94; 20 TR-45-330-93; 21 TR-45-2327-93; 22 TR-45-1143-93; 23 TR-45-1157-94; [24, 27] TR-45-1628-94; 25 TR-45-1581-93; 26 TR-45-2517-93; 28 TR-45-2297-94; 29 TR-45-2298-94; 30 TR-45-1967-93; 31 TR-45-651-93; 32 TR-45-652-93; 33 TR-45-2275-93; 34 TR-45-48-94; and 35 TR-45-2059-93; ORDERING that Defendant must release the following documents to Plaintiff by February 23, 2007: 1 TR-45-1727-93 (redacting the last two paragraphs of page 2); 6 TR-45-959-94; 7 TR-45-1795-94; 10 TR-45-1574-94 (redacting the final paragraph of page 2); 14 TR-45-365-94; 16 TR-45-465-94 (redacting the last paragraph and its header on page 1, redacting the last three paragraphs of page 4, and redacting the last paragraph of page 5); 18 TR-45-2680-93 (redacting page 1 in full, redacting page 2 up until the "Law & Discussion" section, releasing the remainder of page 2, releasing pages 3 and 4 in full, releasing the first three lines of page 5, and redacting the remainder of page 5 and page 6); and 19 TR-45-2069-94 (releasing the last paragraph of page 1 (beginning with "BACKGROUND"), releasing page 2 in full, releasing the first two paragraphs of page 3, redacting the remainder of the memorandum, and releasing the attachments to the memorandum); and DENYING AS MOOT Plaintiff's <u>151</u> Motion to Expedite. Signed by Judge Colleen Kollar-Kotelly on February 7, 2007. (lcckk1) (Entered: 02/07/2007)
02/07/2007	<u>154</u>	MEMORANDUM OPINION. Signed by Judge Colleen Kollar-Kotelly on February 7, 2007. (lcckk1). (Entered: 02/07/2007)
07/23/2007	<u>155</u>	STIPULATION of Dismissal by TAX ANALYSTS, INTERNAL REVENUE SERVICE. (Katinsky, David) (Entered: 07/23/2007)
07/23/2007	<u>156</u>	STIPULATION OF DISMISSAL. Pursuant to this Court's Order and Opinion of February 7, 2007, and subsequent discussions between counsel. Signed by Judge Colleen Kollar-Kotelly on 7/23/07. (dot,) (Entered: 07/25/2007)