United States Tax Court

PRACTITIONER USER GUIDE



DAWSON CASE MANAGEMENT SYSTEM

United States Tax Court

Washington, DC

May 2024

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INTRODUCTION

WHAT IS DAWSON?

The U.S. Tax Court's case management system, DAWSON (Docket Access Within a Secure Online Network), is an electronic filing and case management system designed to make it easier for parties and the Court to start a Tax Court case, file and process documents, and manage cases. DAWSON also has a public search feature where the public can search for cases, Orders, and Opinions that are not sealed.

HOW TO ACCESS DAWSON

You can access DAWSON from a link on the Court's website (https://ustaxcourt.gov/) or by going to https://dawson.ustaxcourt.gov/.

BROWSER COMPATIBILITY

DAWSON is compatible with most up-to-date browsers such as Chrome, Edge, Firefox, or Safari. It is not compatible with outdated browsers such as Internet Explorer.

DAWSON IS MOBILE-FRIENDLY

You can access DAWSON from your mobile device.

- Anything you can do on a computer in DAWSON, you can do on your mobile device: file a Petition, view your case(s), file a document, etc.
- You can also search for cases, orders, and opinions on your mobile device.

WHAT DOCUMENTS ARE VIEWABLE ELECTRONICALLY BY THE GENERAL PUBLIC?

- Opinions and orders issued by the Court.
- Post-trial briefs e-Filed by practitioners on or after August 1, 2023.
- Amicus briefs filed on or after August 1, 2023.
- Stipulated Decisions filed on or after August 1, 2023.
- Documents in sealed cases, or individual documents that are sealed, are not viewable other than by the parties.

SYSTEM STATUS

For information regarding system status, including outages, please visit: https://status.ustaxcourt.gov/.

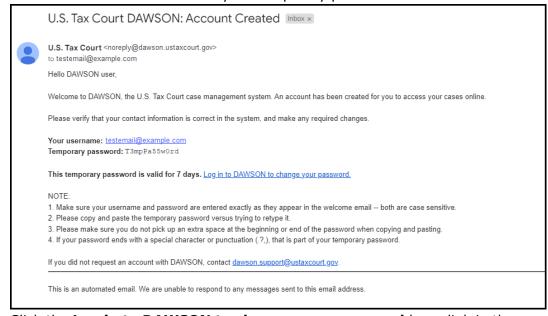
HOW TO GET A DAWSON ACCOUNT

The Court will create DAWSON accounts for practitioners. **DO NOT** create your own account in DAWSON.

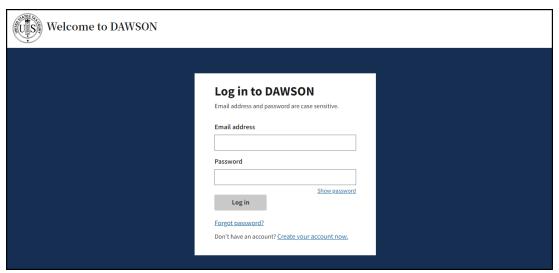
- Practitioners with eAccess credentials who did not receive temporary DAWSON
 credentials, or did not activate them before they expired, should contact
 dawson.support@ustaxcourt.gov to request new temporary DAWSON credentials.
- Practitioners who did not previously register for eAccess and would like to register for DAWSON should contact dawson.support@ustaxcourt.gov.
- Practitioners who would like to apply for admission to practice before the U.S. Tax Court can find the application and instructions here: https://ustaxcourt.gov/practitioners.html.
- DAWSON access will be provided to successful applicants with their other admissions materials.
- DAWSON Tips and Reminders for Practitioners can be found here:
 https://ustaxcourt.gov/resources/dawson/DAWSON_Reminders_for_Practitioners.pdf

You will receive a welcome email when your account has been created.

1. The welcome email will include your temporary password.

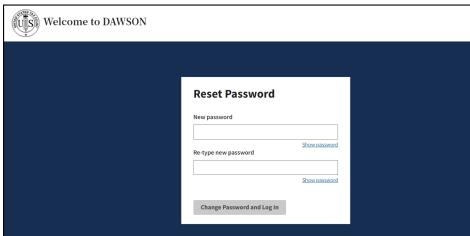


- 2. Click the **Log in to DAWSON to change your password** hyperlink in the email.
- 3. Enter your **email** and the **temporary password** from the welcome email.



4. Click Log In.

- a. **IMPORTANT:** Your email and temporary password are case sensitive. Please enter them exactly as they appear in the welcome email.
- b. The temporary credentials sent to practitioners are valid for only 7 days. If you do not reset your password within that time, the temporary password expires.
- 5. Create your new password by using Reset Password. The password rules are:
 - a. Password must not contain leading or trailing space.
 - b. Password must contain a lowercase letter.
 - c. Password must contain an uppercase letter.
 - d. Password must contain a special character.
 - e. Password must contain a number.
 - f. Password must contain at least 8 characters.

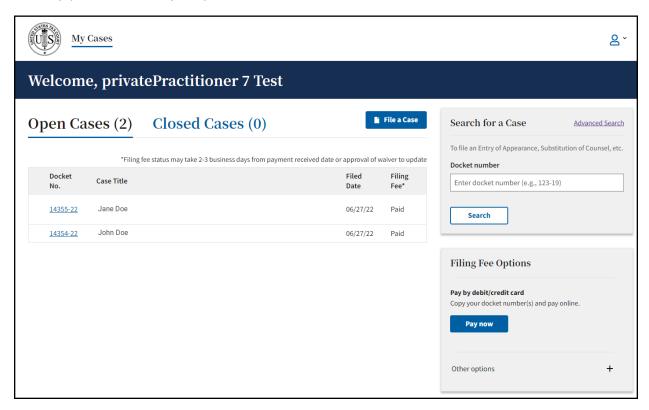


6. Click Change Password and Log In.

- a. Upon successfully setting a new password, you should be routed to your dashboard in DAWSON.
- b. Your email address as username and your chosen password will be your DAWSON credentials moving forward.

DASHBOARD

Your dashboard is your main landing page once signed into DAWSON. You can view all your cases (open and closed) on your dashboard.



TIPS & TRICKS

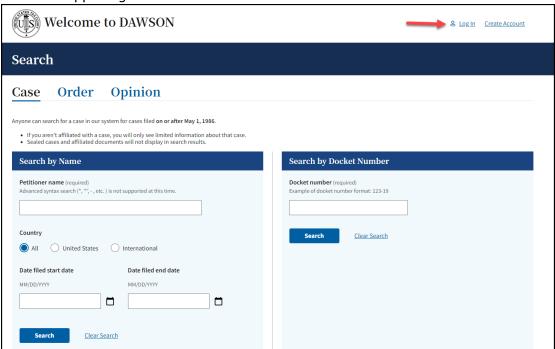
- To return to your dashboard from anywhere within the application, click **My Cases**.
- Open cases and closed cases are displayed on separate tabs. The number of cases for each is displayed in parentheses.
- The default display is 20 cases. To view more, click the Load More button.
- See here for more information about this display for consolidated cases.

HELPFUL LINKS

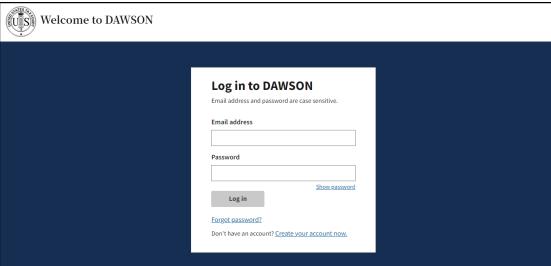
- 1. How to Create a Case https://www.ustaxcourt.gov/efile a petition.html
- 2. Find a Court Location https://ustaxcourt.gov/dpt_cities.html
- 3. U.S. Tax Court Forms https://ustaxcourt.gov/case-related-forms.html

LOG IN TO DAWSON

 To Log in to DAWSON after your initial account setup, go to DAWSON and click Log In in the upper right corner.



2. You will be routed to the login screen where you will enter your **email address** and **password**:



LOG OUT OF DAWSON

When you are done with your session in DAWSON, you should log out.

 To log out of DAWSON, click the **Person Icon** and then **Log Out** in the upper right corner.



AUTOMATIC LOG OUT

For security purposes, you will be logged out of DAWSON after an extended period of inactivity.

1. After 60 minutes of inactivity, a message box will display and ask if you are still there:



2. If you do not respond within 5 minutes, you will be automatically logged out of DAWSON.

RESET YOUR PASSWORD

If you forgot your password or otherwise need to reset it, on the log-in screen:

- 1. Click Forgot password?
- 2. Enter email address.
- 3. Click Send Password Reset.
- 4. Retrieve **reset code** from your email. (Check your spam folder if you do not see it.)
- 5. Enter **reset code**.
- 6. Create your new password.

BEFORE YOU ELECTRONICALLY FILE A PETITION

The Petition and Statement of Taxpayer Identification Number (STIN) documents must be completed and submitted when you create a case with the US Tax Court. If the petitioner received an IRS Notice(s), you will be asked to upload it separately. These documents can be prepared in advance before you start the process of creating a new case in DAWSON.

- 1. Prepare the <u>Petition</u>, <u>STIN</u>, and IRS Notice(s), and save them into individual PDF files before beginning the filing process. If filing on behalf of a business, you will also need to prepare the <u>Corporate Disclosure Statement</u>.
 - a. Electronic signature guidance
 - i. The combination of username (email address) and password in DAWSON serves as the signature of the individual filing the document.
 - If the document requires a signature in addition to that of the party you represent, such as in a case where both spouses are petitioners and you only represent one spouse, the document should be signed by the additional party before being uploaded.
 - 2. If the document is being filed by multiple practitioners, the document should be signed by the additional practitioners before being uploaded.
 - ii. Acceptable digital signatures in DAWSON
 - Parties may submit a high-resolution or PDF document bearing either imaged or digitized signatures in satisfaction of the requirements of Rule 23(a)(3), Tax Court Rules of Practice and Procedure.
 - 2. PDFs of documents bearing an actual signature are acceptable. (Print and sign before turning into a PDF)
 - Documents signed using an authentication program (e.g., Adobe or DocuSign) are acceptable. Be sure to remove encryption of password protection prior to uploading into DAWSON.
 - 4. Stylized signatures (e.g., signing with "/s" or using cursive font) are only acceptable when paired with the DAWSON username (email address) and password or with authorization. See Rule 23(a)(3).
 - 5. Stylized signatures on paper-submitted forms are not acceptable.
- 2. You will NOT need a Request for Place of Trial form if you eFile a Petition.
- 3. The File a Case process must be completed in one sitting; you will not be able to save your work and come back to it.
- 4. Do NOT file a Petition both electronically and by mail.
- 5. All documents must be in PDF format (.pdf).
 - a. The maximum file size for each document is 250MB.
 - b. Be sure that the PDF is not encrypted or password protected.
 - c. Note: PDF Portfolio files are not supported at this time.

6. To ensure that your electronic petition and Statement of Taxpayer Identification Number forms save and upload correctly, please use Adobe software. Don't have Adobe? Download it for free here: https://www.adobe.com/acrobat/pdf-reader.html

7. IMPORTANT

a. In most cases, the Court must receive your electronically filed
Petition no later than 11:59 pm Eastern Time on the last date to file.
Petitions received after this time may be untimely and your case may be dismissed for lack of jurisdiction.

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ELECTRONICALLY FILE (EFILE) A PETITION

Practitioners with an active DAWSON account can file Petitions online. Because the combination of username and password serves as the signature of the individual filing the document, if the document is being filed by multiple practitioners, the document should be signed by the additional practitioners before being uploaded. For more information about signatures, including what constitutes an acceptable digital signature, refer to this section of this user guide: Before You Electronically File a Petition.

HOW TO FILE A PETITION ONLINE (CREATE A CASE)

- 1. Log in to your DAWSON account.
- 2. Select the **File a Case** button on your dashboard.
- 3. Follow the prompts. There will be 5 steps to complete the Create a Case process. All fields are required unless specifically noted as optional.



- 4. Step 1: Upload the Statement of Taxpayer Identification Number (STIN)
 - a. Upload the <u>Statement of Taxpayer Identification Number (STIN)</u> PDF by clicking **Choose File** and selecting the appropriate PDF from your device.
 - b. This is the **only** document where the SSN/EIN/TIN should NOT be redacted.
 - c. Click the Continue to Step 2 of 5 button.
- 5. Step 2: Upload the Petition and the IRS notice(s) if the petitioner received one.
 - a. Upload the <u>Petition</u> PDF (whether on Form 2 or otherwise) by clicking **Choose File** and selecting the appropriate PDF from your device.
 - b. Select (Yes or No) whether the petitioner received a Notice from the IRS.
 - i. If **Yes**, select the type of IRS Notice the petitioner received from the Type of notice/case dropdown list.
 - After selecting the type of notice, upload a PDF of the IRS Notice(s) by clicking **Choose File** and selecting the appropriate PDF from your device.



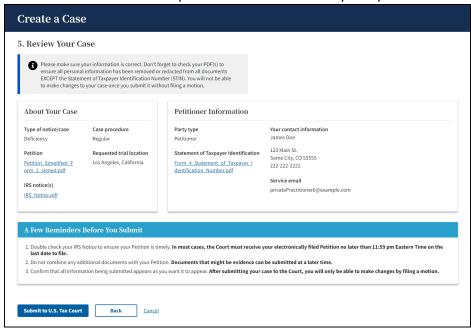
- ii. If **No**, select the issue the petitioner is disputing with the IRS from the Which topic most closely matches your complaint with the IRS? dropdown list.
- c. Click the Continue to Step 3 of 5 button.
- 6. Step 3: Enter Petitioner Information: Who are you filing this petition for?
 - a. Select the type of petitioner for whom you are filing this Petition using the I am filing this petition on behalf of ... options. More questions and options for answers will follow based on the choices selected.





- b. Enter the petitioner(s)' contact information in the **Tell Us About the Petitioner** section, as applicable.
- c. For businesses, upload the <u>Corporate Disclosure Statement</u> PDF by clicking Choose File and selecting the appropriate PDF from your device.
- d. Click the Continue to Step 4 of 5 button.
- 7. Step 4: Enter Case Procedure and Trial Information: What case procedure should you use for trial?
 - Select the requested Case Procedure for this case: Regular Case or Small Case.
 - b. Select the **Preferred Trial Location** from the provided trial cities.
 - c. The system will limit your options by the type of Case Procedure chosen.
 - d. A Request for Place of Trial form is not required for eFiled Petitions.
 - e. Click the Continue to Step 5 of 5 button.
- 8. Step 5: Review Your Petition and Submit
 - a. Review the information for completeness and accuracy.
 - i. Review the **About this Case** section for general Petition information.
 - ii. Review the **Petitioner Contact Information** section to confirm petitioner information.

- iii. Verify that the Service Information section displays your correct service email. Changes to your information will need to be made in Account Management.
- iv. Click the **PDF links** under the **About Your Case** and **Petitioner Information** Sections to preview the documents you uploaded.



- b. Click the **Submit to U.S. Tax Court** button.
 - You will **not** be able to go back and make changes to this information once you submit the Petition and related documents without filing a motion.
- 9. Confirmation Screen:
 - a. The confirmation screen displays the docket number along with additional guidance and next steps.



Docket Number: 19159-23

James Doe, Petitioner v. Commissioner of Internal Revenue, Respondent

Your case has been assigned Docket Number 19159-23.

Once your Petition is processed by the Court, you'll be able to see and print a confirmation page under the Case Information tab in your case. You'll also be able to check the status of your case, submit new documents, and view activity in the case on the docket record.

Next steps

- You'll need to pay a filing fee or submit a waiver. You can view all the options for this on your "My Cases" page.
- As new information about the case becomes available you will be notified at the email address you
 provided.

View Dashboard

TIPS & TRICKS

- Be sure to have all required documents prepared and saved as PDFs before you
 begin to file online. You will need the written Petition, Statement of Taxpayer
 Identification Number, and, for businesses, a Corporate Disclosure Statement.
- A copy of the IRS notice, if the petitioner received one, should also be uploaded.
- You will NOT need a Request for Place of Trial form.
- When entering the petitioner information, select the type of petitioner that most closely matches your client.
- Do not submit additional documents with the Petition. You will be able to file additional documents (such as an Application for Waiver of Filing Fee, etc.) **AFTER** the Petition has been processed by the Court.

OTHER PETITION FILING OPTIONS

If you do not wish to file the petition electronically via DAWSON, you may file by mail or in Person.

- 1. To file by mail
 - a. Send required forms and the \$60 filing fee to:

United States Tax Court

400 Second Street, NW

Washington, DC 20217

2. To file in person

a. Bring required forms and the \$60 filing fee to:

United States Tax Court

400 Second Street, NW

Washington, DC 20217

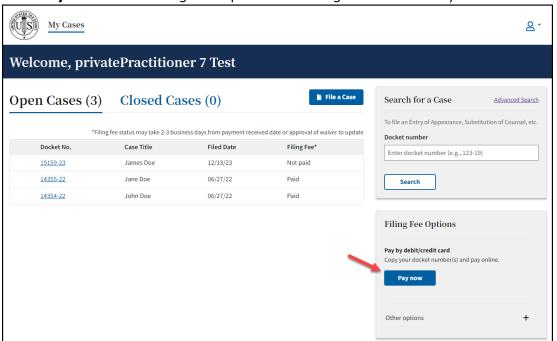
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PAY FILING FEE

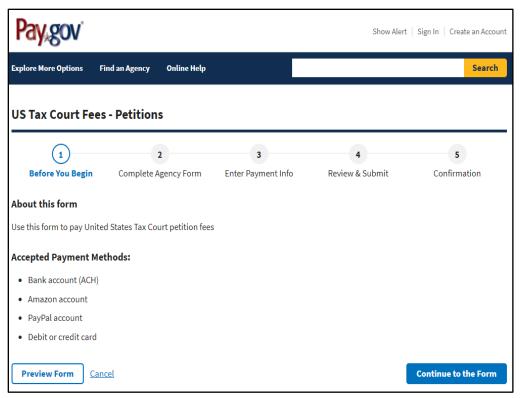
The Court's filing fee is \$60 and may be paid online, by mail, or in person. A request to waive the filing fee may be made by filing an Application for Waiver of Filing Fee. The petition must be processed by the Court before the Application for Waiver of Filing fee can be filed electronically.

HOW TO PAY FILING FEE ONLINE

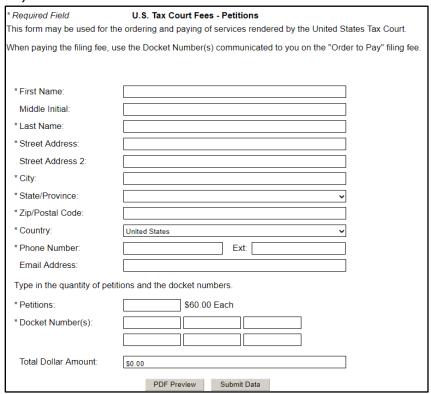
- 1. Log in to your DAWSON account.
- 2. Click Pay Now under Filing Fee Options on the right-hand side of your dashboard.



- 3. Pay.gov will open in a separate window.
- 4. Click Continue to the Form.



5. Fill out personal details, including your Docket Number(s). You received your Docket Number after submitting your Petition online. It is also listed by your case on your dashboard. Docket Number(s) should be entered in xxxxx-xx format (e.g., 12345-20).



6. Click Submit Data.

- 7. Select payment method.
- 8. Click Next.
- 9. Enter payment information.
- 10. Click Review and Submit Payment.
- 11. Print Confirmation Page.

TIPS & TRICKS

- Accepted payment methods include bank account/electronic check, Amazon account, PayPal account, debit card, or credit card.
- Be sure to have the Docket Number(s) handy for reference during the payment process.
- Note: It may take a few days for payment confirmation to be reflected in DAWSON.

OTHER PAYMENT OPTIONS

You may mail payment to the US Tax Court, or you may submit an Application for Waiver of Filing Fee.

- 1. Mail-in Payment
 - i. Include Petitioner(s)' name and Docket Number(s) on the check
 - ii. Make checks/money orders payable to:

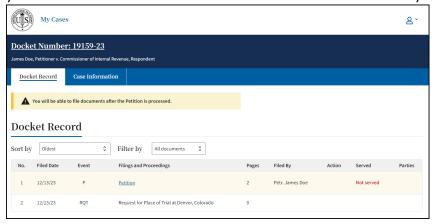
Clerk, United States Tax Court

400 Second Street, NW

Washington, DC 20217

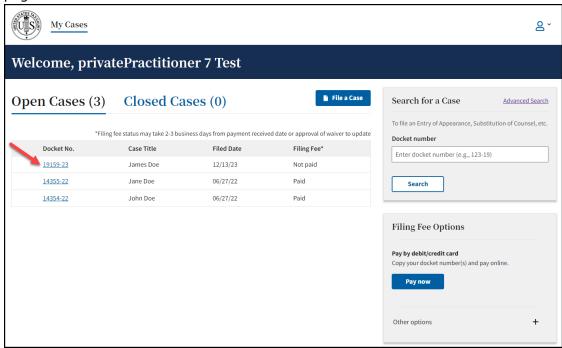
2. Waiver

- i. Can't afford to pay the filing fee?
- ii. Submit an Application for Waiver of Filing Fee.
- iii. This waiver can be submitted electronically in DAWSON, or you can mail it to the address listed above.
 - 1. If you are filing the waiver electronically, you will need to wait until the petition is processed by the Court. Once processed, you will be able to file this and other documents electronically.



CASE DETAIL PAGE

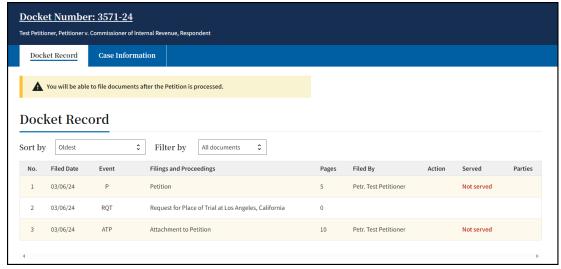
1. When you click on the Docket Number of your case on your dashboard, you will be routed to the Case Detail page. You can view various details about a case on this page.



CASE HEADER

In the case header (dark blue banner), you can find:

- 1. Docket Number
- 2. Name of Case (Case Caption)
- 3. File a Document (After the petition has been processed by the Court).



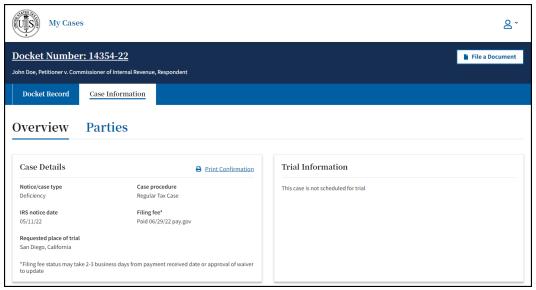
DOCKET RECORD TAB

- 1. On the Docket Record tab, you will find a list of all documents filed in the case.
- 2. The Docket Record is the Court's official record of a case.
- 3. The Docket Record is sortable by date or index number. The default display is by date, oldest to newest.
- 4. A printer-friendly Docket Record is available by clicking **Printable Docket Record** in the upper right corner on the Docket Record tab (This link is available after the Petition has been processed by the Court.).

CASE INFORMATION TAB

1. Overview Tab

a. The Overview tab contains information about the case:



- i. Type of case
- ii. Regular Case or Small Case procedure election
- iii. IRS notice date
- iv. Filing fee information
- v. Requested place of trial
- vi. Trial information
- vii. Consolidated Case Information
 - 1. If your case is part of a consolidated group, you will see a Consolidated Cases card on the Overview tab. This card displays and links to all cases in the consolidated group.

2. Parties Tab

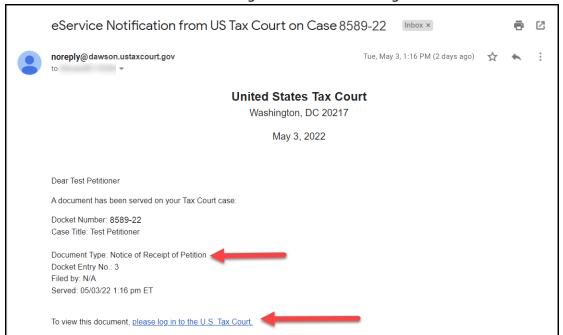
- a. Petitioner(s) & Counsel Sub-Menu
 - The Petitioner(s) & Counsel Sub-Menu lists the contact information (name, address, phone number, and email) and service method for all petitioner(s). It also includes the information for petitioner(s) counsel, if any.
- b. Intervenor/Participant(s) Sub-Menu

- i. The Intervenor/Participant(s) Sub-Menu lists the contact information (name, address, phone number, and email) and service method for any intervenor(s) or other participant(s).
- c. Respondent Counsel Sub-Menu
 - The Respondent Counsel Sub-Menu lists the contact information (name, address, phone number, and email) and service method for all IRS attorneys on the case.

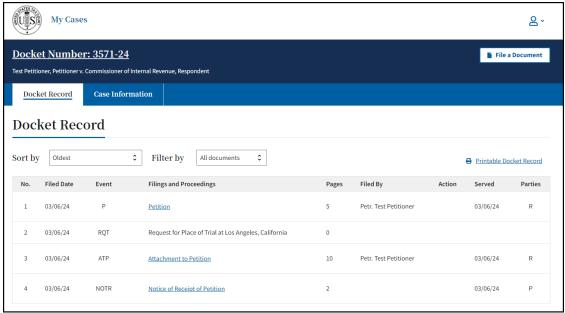
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NOTICE OF RECEIPT OF PETITION

- 1. When the Court processes the petition and serves it on Respondent (the IRS), you will receive an eService email from noreply@dawson.ustaxcourt.gov.
- 2. Click on the link in the email to navigate to DAWSON. Log in to view the document.



3. After clicking on the Docket Number of the case from your dashboard, note that the Notice of Receipt of Petition is now available on the Docket Record.



- 4. If you uploaded an IRS Notice(s), it will be filed on the docket record as Attachment to Petition.
- 5. The **File a Document** button is now available in the upper right corner of the screen.

UPDATE CONTACT INFORMATION

Private Practitioners can update their contact information within DAWSON.

IRS PRACTITIONERS

If you are an IRS Practitioner, contact Admissions (<u>admissions@ustaxcourt.gov</u>) if you need to update your contact information.

PRIVATE PRACTITIONERS

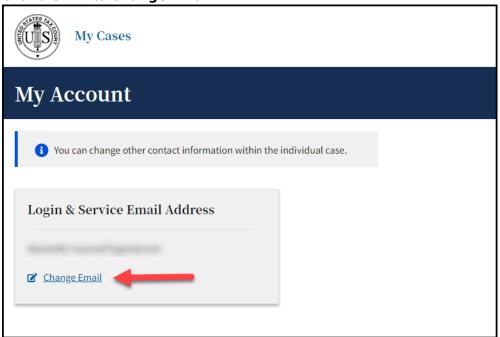
1. As a practitioner, you can update your contact information by clicking on the **Person Icon** and then **My Account** in the upper right corner.



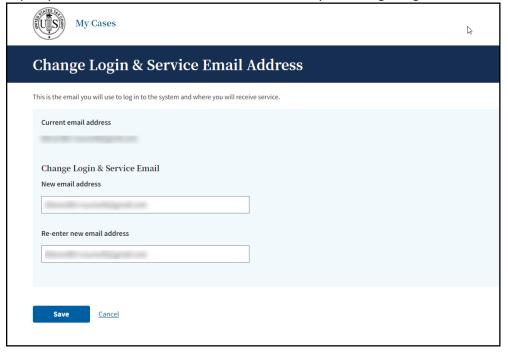
- 2. Updating your contact information (Address or Phone number) will automatically generate one of the following:
 - a. A Notice of Change of Address
 - b. A Notice of Change of Phone Number
 - c. A Notice of Change of Address and Phone Number
 - 1. The automatically generated notices will be filed and served in each of your open cases, and in any case closed within the past 6 months.
- 3. Updating your email address does **NOT** automatically generate a Notice of Change of Email Address.
 - a. NOTE that changing your email address in DAWSON will change both your service email and your login email. Only one email address per account is permitted.
 - b. Click on the dropdown arrow in the upper right-hand side of the screen and select **My Account**.



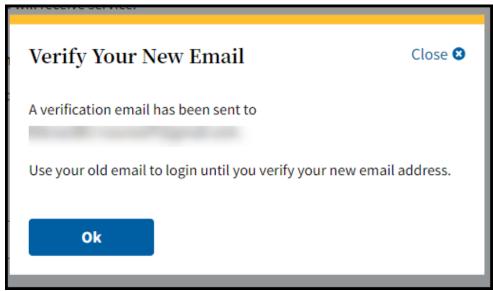
c. Click the link to **Change Email**.



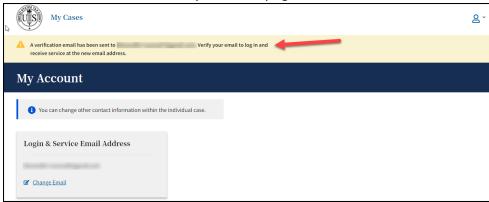
d. Input your new email address and confirm it by entering it again. Click **Save**.



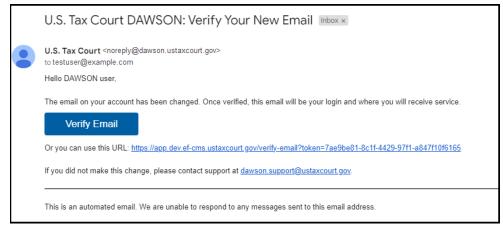
e. A pop-up window will display and it will indicate that the verification email was sent to the new email address. Click **OK.**



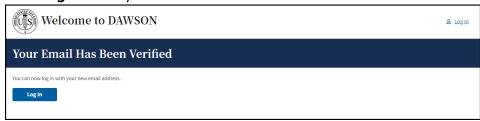
f. You should see a yellow banner indicating that the email was sent to the new email address here on the My Account page as well.



- g. DO NOT LOG OUT OF DAWSON! STAY LOGGED IN! DO NOT CLOSE YOUR BROWSER WINDOW!
- h. In a new browser tab, while staying logged in to DAWSON on a separate browser tab, navigate to the new email address inbox. You will have an email from noreply@dawson.ustaxcourt.gov.
 - 1. If you don't see it in your inbox, check your junk/spam/promotions folders.
- i. Open the email and then click on the link for **Verify Email**.



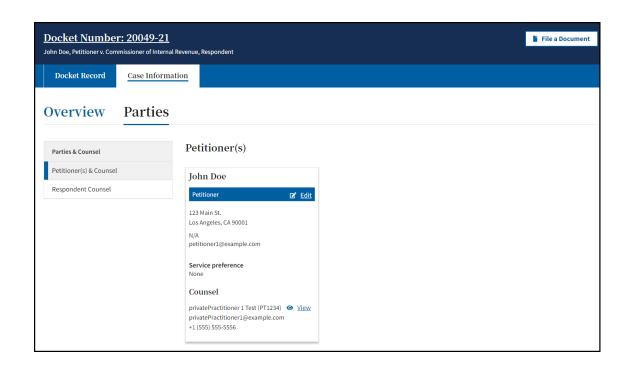
j. After you click **Verify Email** you will be directed to this page, where you can click **Log In** with your new email address.



- k. Log into DAWSON with your new email address. Your password will remain the same as it was previously.
- 4. Employer changes
 - a. Be sure that you have:
 - 1. Withdrawn from all your active cases.
 - 2. Updated your contact information in DAWSON.
 - 3. Contacted Admissions (<u>admissions@ustaxcourt.gov</u>) to request an update to the employer information associated with your account, so that your information is correct in DAWSON.
- 5. REMINDER: Each person admitted to practice before the Court shall promptly notify the Court of any change in contact information. See Rule 200€, Tax Court Rules of Practice and Procedure.

PETITIONERS

- 1. Client petitioner mailing addresses and phone numbers can be updated within DAWSON.
- 2. A petitioner's mailing address and phone number are updated by clicking **Edit** by the petitioner's name on the **Petitioner** tab under **Case Information** within a case.
- 3. Updating a petitioner's contact information (mailing address or phone number) will automatically generate one of the following notices in the case:
 - a. A Notice of Change of Address
 - b. A Notice of Change of Phone Number
 - c. A Notice of Change of Address and Phone Number
- 4. A petitioner's mailing address and phone number will need to be updated separately in each of their cases.



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ELECTRONICALLY FILE (EFILE) OTHER DOCUMENTS

You may eFile documents other than a Petition in DAWSON.

EFILING IS MANDATORY

- 1. Electronic filing (eFiling) is mandatory for most parties represented by counsel (practitioners) in cases with petitions filed on or after July 1, 2010.
 - a. See Rule 26(b), Tax Court Rules of Practice and Procedure.
 - b. Mandatory eFiling does not apply to:
 - i. Pro se petitioners, including petitioners assisted by low-income taxpayer clinics and Bar-sponsored pro bono programs that participate in Tax Court calendar calls.
 - ii. Practitioners who apply to the Court for and are granted relief from the requirement to eFile based on good cause.
 - iii. Documents filed at trial sessions; or documents not eligible for eFiling.
 - c. The Court will not accept for filing any document required to be eFiled under this policy that is submitted by mail or delivered to the Clerk's Office in paper form unless it is accompanied by a motion for leave to file in paper and that motion is granted.

EXEMPTION FROM EFILING FOR LOW-INCOME TAXPAYER CLINICS AND BAR-SPONSORED PRO BONO PROGRAMS

- 1. Practitioners employed by low-income taxpayer clinics or who assist taxpayers as part of a Bar-sponsored pro bono program may, but are not required to, eFile on their clients' behalf.
- 2. Practitioners who wish to be exempt from eFiling under the low-income taxpayer clinic/Bar-sponsored pro bono program exemption must file a motion to be exempt from eFiling in each case in which they wish to be exempt.

GOOD CAUSE EXCEPTION TO EFILING

- 1. Upon motion and a showing of good cause, the Court may exempt a practitioner who has entered an appearance in a case (or cases) from eFiling and permit filing in paper form.
- 2. If a practitioner is unable to eFile, they must file in <u>each case</u> for which they are seeking to be exempt a paper motion for leave to be exempted from eFiling (motion for exemption) and show good cause (i.e., hardship to the practitioner) why he or she cannot eFile. There is no blanket exception.
- 3. A motion for exemption, if granted, does not alter any preexisting deadlines.
- 4. Accordingly, the practitioner may also wish to submit in paper form, along with the motion for exemption, any responsive documents that are due to ensure all filing deadlines are met.
- 5. Note: If the Court grants a practitioner's motion for exemption, they will not be eligible to receive electronic service (eService) in that case.

WHAT DOCUMENTS MAY BE EFILED

- 1. Please refer to the Tax Court's website for a <u>comprehensive list of documents</u> that can be eFiled in DAWSON.
- 2. If a document that you wish to file with the Court is not included on that list, it should be filed by mailing a paper copy to the Court.
 - a. Please include the case caption (e.g., ABC Corporation, Petitioner v. Commissioner of Internal Revenue, Respondent) and Docket Number on all filings.

HOW TO EFILE A DOCUMENT

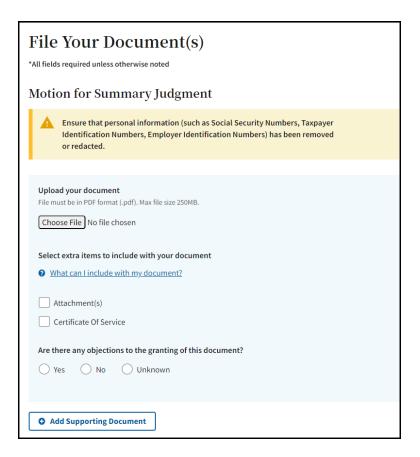
1. As a practitioner representing a party to a case, you may eFile a document in that case by clicking on **File a Document** in the case header:



2. From the **What Document are You Filing?** dropdown, select the document you wish to file and click **Continue**.

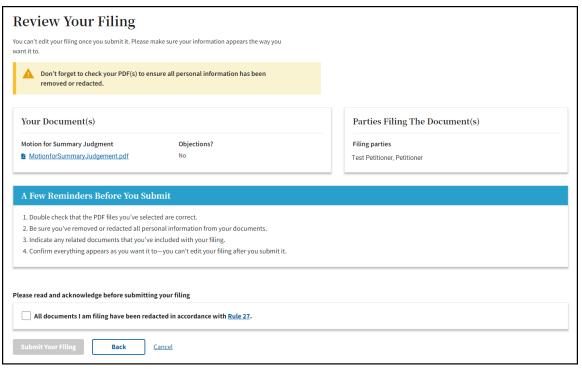


- 3. You can filter the dropdown options by keyword.
 - a. Keyword(s) can be an exact or partial match. For example, entering "summary" will display "Motion for Summary Judgment" and "Motion for Partial Summary Judgment."
- 4. **Upload** a PDF of your document and answer the required questions.
 - a. NOTE: The required questions may change depending on the document type you are filing.

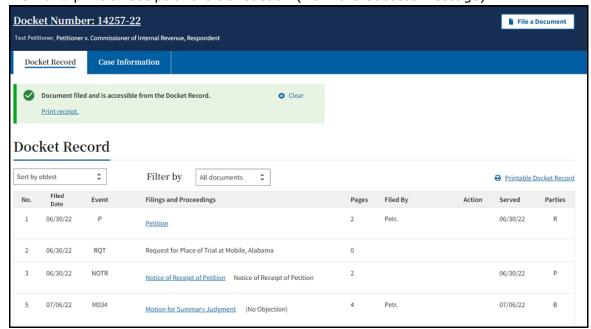




- 5. Click **Review Filing** to generate a summary for review before filing.
- 6. Click **Back** to return to the previous screen and make changes.
- 7. Click **Cancel** to cancel the transaction.
- 8. Review Filing.



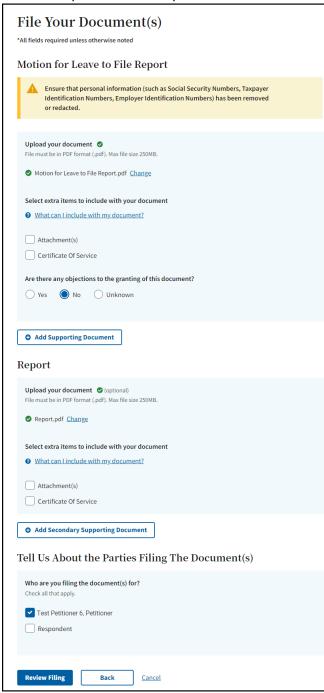
- 9. If you confirm that the documents that you are filing are redacted in accordance with Rule 27, check the box. Once you check the box, the **Submit Your Filing** button will become active.
- 10. Click **Submit Your Filing** to file the document.
- 11. Click **Back** to return to the previous screen and make changes.
- 12. Click Cancel to cancel the transaction.
- 13. After successfully filing a document, you should be directed to the Docket Record in the case where you can see the document filed on the Docket Record. You can also view and print a receipt of the transaction (from the Success Message):



TIPS & TRICKS

- All uploaded documents must be in PDF format (.pdf). The maximum file size for each upload is 250MB.
 - Note: PDF Portfolio files are not supported at this time.
- If your document is larger than 250MB, you should upload the information in pieces as separate documents--each must be 250MB or less.
 - If you have multiple documents that you would like to upload, and they are the same document type (e.g., Exhibits), combine them into one PDF document (not to exceed 250 MB), rather than uploading each document separately.
- You can upload/file up to 5 supporting documents (declarations, affidavits, etc.) as part of the same transaction.
- To file several separate documents, complete the File a Document flow as many times as needed.
- If the document you are filing requires a signature:
 - The combination of username (email address) and password in DAWSON serves as the signature of the individual filing the document.
 - If the document requires a signature in addition to that of the party you represent, such as in a case where both spouses are petitioners and you only represent one spouse, the document should be signed by the additional party before being uploaded.
 - If the document is being filed by multiple practitioners, the document should be signed by the additional practitioners before being uploaded.
 - Note: In TEFRA cases being submitted under Rule 248(a), the tax matters partner must sign to certify that no other party objects to the entry of decision.
 - Acceptable digital signatures in DAWSON
 - Parties may submit a high-resolution or PDF document bearing either imaged or digitized signatures in satisfaction of the requirements of Rule 23(a)(3), Tax Court Rules of Practice and Procedure.
 - PDFs of documents bearing an actual signature are acceptable. (Print and sign before turning into a PDF)
 - Documents signed using an authentication program (e.g., Adobe or DocuSign) are acceptable.
 - Stylized signatures (e.g., signing with "/s" or using cursive font) are not preferred but are acceptable when made with authorization.
- Lodged Documents
 - A **Lodged** document means that the document is sent to, but not yet officially filed with, the Court.
 - A document is Lodged with the Court as part of a Motion for Leave to File
 (asking the Court's permission to file something the Court did not ask for) or

- a Motion for Leave to File out of Time (asking the Court's permission to file something late).
- When filing a Motion for Leave to File type of document, the user is prompted to identify and upload the document that should be lodged with the motion.
- In the example below, the Party uploaded a Motion for Leave to File Report, and also uploaded the Report document.



 The Report document will appear as (Lodged) on the docket record after the document is submitted.



- o The Judge assigned to your case will either grant or deny the motion.
 - If the motion is granted, the Court will officially file the document on the docket record.
 - If the motion is denied, the document will remain as Lodged on the docket record and will not be filed.

ENTRY OF APPEARANCE

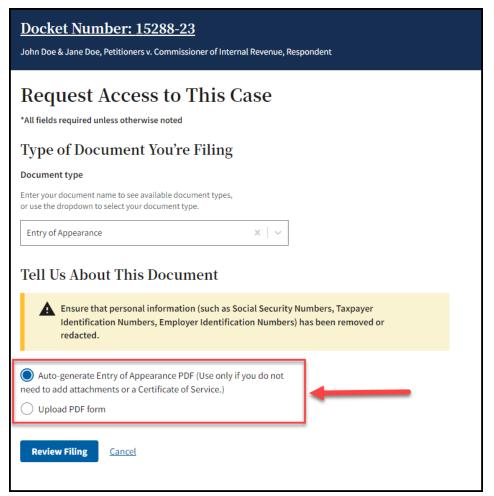
- 1. Entry of Appearance for Respondent (the IRS)
 - a. The very first IRS attorney to file a document in a case should click on **File First IRS Document** in the case header:



- b. eFiling the first IRS document using a DAWSON account will serve as that attorney's Entry of Appearance. The Court will manually associate (enter an appearance for) any additional IRS attorney(s) who signed that first document.
- c. Thereafter, any subsequent IRS attorney who needs access to the case to file something will need to file an Entry of Appearance or Substitution of Counsel. This may be done by clicking on **Request Access to Case** in the case header:

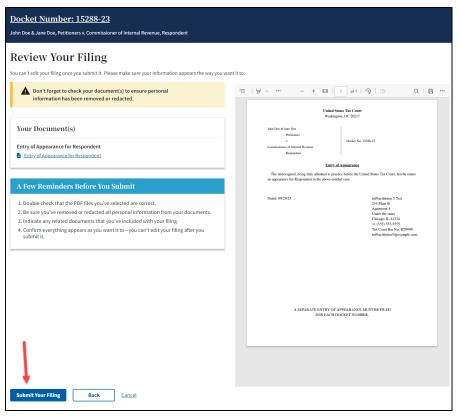


1. When filing an Entry of Appearance, there is now an option to either automatically generate the document (if all parties to the case receive electronic service) or upload a PDF form.



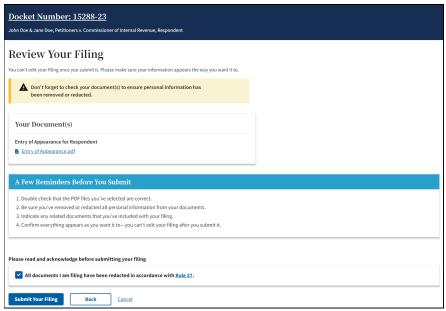
2. Auto-Generate Entry of Appearance

- 1. This option will only display if all parties to the case receive electronic service.
- 2. If you selected auto-generate Entry of Appearance PDF, note that this workflow does not support the addition of attachments, or a Certificate of Service.
- 3. Click the **Review Filing** button.
- 4. The **Review Your Filing** page will display. This screen displays the auto-generated Entry of Appearance form on the right side of the page.
- 5. Be sure to review the document.
- Click **Submit Your Filing** to file the auto-generated Entry of Appearance.



3. Upload PDF Form

- 1. If you selected **Upload PDF Form**, you can select whether you have Attachments, including a Certificate of Service (required for parties receiving paper service).
- 2. Click on the **Choose File** button and select the PDF file from a location on your computer.
- 3. Click **Review Filing**.
- 4. The **Review Your Filing** page will display.
- 5. Be sure to review the document.
- 6. Check the box to confirm that you have ensured that the document has been redacted in accordance with Rule 27.
- 7. Click **Submit Your Filing** to file the uploaded PDF.



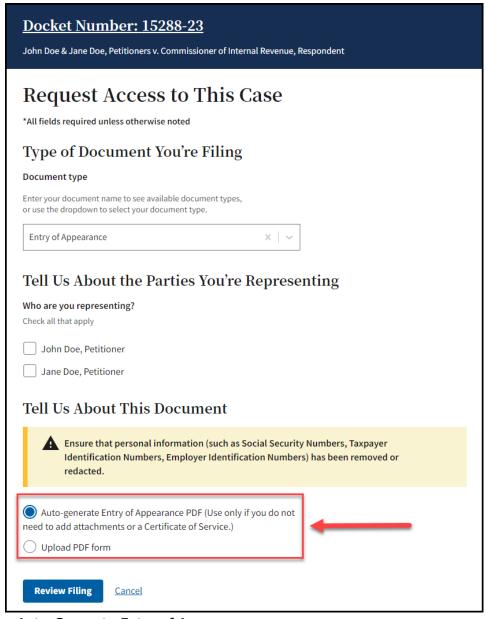
d. Once an IRS attorney is associated with a case (by filing/signing the first document, or filing an Entry of Appearance, Substitution of Counsel, etc.), they will be able to eFile documents in that case by clicking on **File a Document** in the case header:



- 2. Entry of Appearance for a Private Practitioner
 - a. If a Practitioner with an active DAWSON account did not file the Petition on behalf of a petitioner and now wants to appear on behalf of the petitioner, the practitioner will need to file an Entry of Appearance, Substitution of Counsel, etc. to gain access to the case. This may be done by clicking on **Request Access to Case** in the case header:

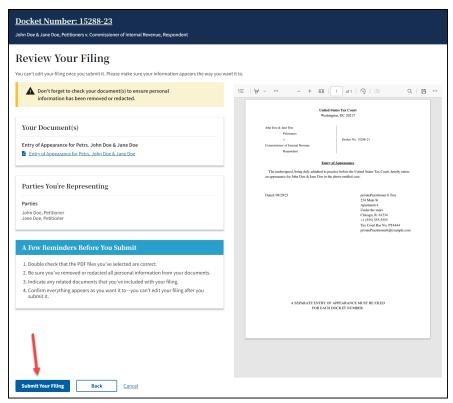


1. If filing an Entry of Appearance, there is now an option to either automatically generate the document or upload a PDF form.



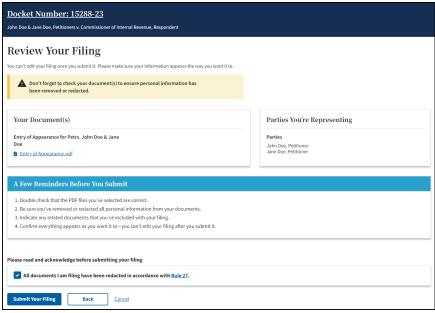
2. Auto-Generate Entry of Appearance

- 1. If you selected auto-generate Entry of Appearance PDF, note that this workflow does not support the addition of attachments, including a Certificate of Service.
- 2. Click the **Review Filing** button.
- 3. The **Review Your Filing** page will display. This screen displays the auto-generated Entry of Appearance form on the right side of the page.
- 4. Be sure to review the document.
- 5. Click **Submit Your Filing** to file the auto-generated Entry of Appearance.

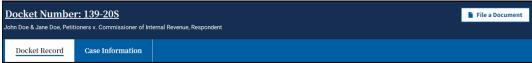


3. Upload PDF Form

- If you selected **Upload PDF Form**, you can select whether you have Attachments or a Certificate of Service included with the document upload.
- 2. Click on the **Choose File** button and select the PDF file from a location on your computer.
- 3. Click **Review Filing**.
- 4. The **Review Your Filing** page will display.
- 5. Be sure to review the document.
- 6. Check the box to confirm that you have ensured that the document has been redacted in accordance with Rule 27.
- 7. Click **Submit Your Filing** to file the uploaded PDF.

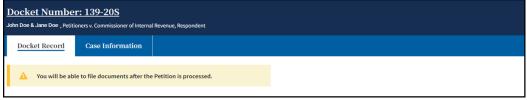


b. Once the practitioner is associated with a case, they will be able to eFile documents in that case by clicking on **File a Document** in the case header:



SPECIAL CIRCUMSTANCES

- 1. Filing Additional Document(s) Before Service of Petition
 - a. Additional documents cannot be eFiled in a new case until after the Petition is processed and served on the IRS.
 - b. Before the Petition is served on the IRS, the user will get a warning that no additional documents can be eFiled until after the Petition is processed:

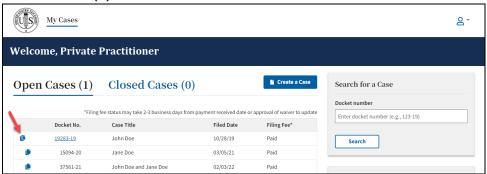


c. After the Petition is processed and served on the IRS, a practitioner will be able to eFile new documents in a case by clicking on **File a Document** in the case header:



- 2. eFiling in Consolidated Cases
 - a. Cases that are consolidated display the consolidated case icons to the left of the docket number on the **My Cases** Page.

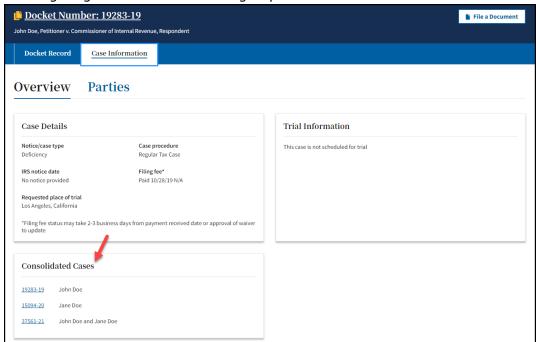
i. The lead case in a consolidated group has an icon with an "L"; the member case(s) has a solid blue icon.



- b. Cases in which you are counsel have an active hyperlink on the **My Cases**Page; Cases in which you are not counsel do not have a hyperlink.
- c. Consolidated cases have a yellow consolidated case icon next to the Docket Number on the case header.



d. On the case information tab within a consolidated case, there is a **Consolidated Cases** tile that lists the docket numbers and Petitioner names of all the cases in the group. Each case in the group has a hyperlink for ease of navigating to other cases in the group.



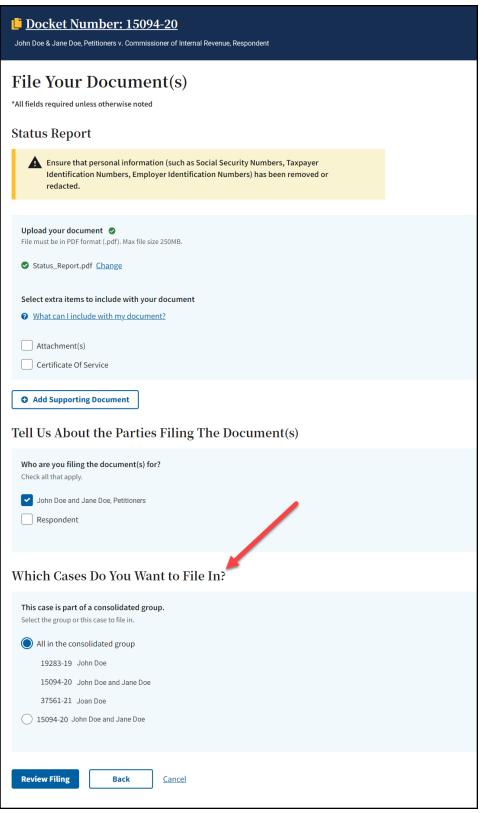
e. The documents on the docket record of each case in a consolidated group are visible to all parties of the cases in the group, except for documents that are sealed to the public and parties of the case.

- f. In DAWSON, parties can file some documents simultaneously across all cases in a consolidated group; however, not all documents are able to be filed simultaneously:
 - Petitioner's counsel cannot simultaneously file documents across multiple cases, even if consolidated, which lead to an Entry of Appearance, including:
 - 1. Entry of Appearance
 - 2. Limited Entry of Appearance
 - 3. Motion to Substitute Parties and Change Caption
 - 4. Notice of Election to Intervene
 - 5. Notice of Election to Participate
 - 6. Notice of Intervention
 - 7. Substitution of Counsel
 - ii. Respondent's counsel may, but is not required to, enter an appearance simultaneously across all cases in a consolidated group.
 - iii. No party can simultaneously file decision documents across multiple cases, even if consolidated, including:
 - 1. Agreed Computation for Entry of Decision
 - 2. Computation for Entry of Decision
 - 3. Motion for Entry of Decision
 - 4. Motion to Modify Decision in Estate Tax Case Pursuant to Rule 262.
 - 5. Proposed Stipulated Decision
- g. When eFiling in a consolidated group of cases, click on the **File a Document** button in one of the cases in which you are counsel.



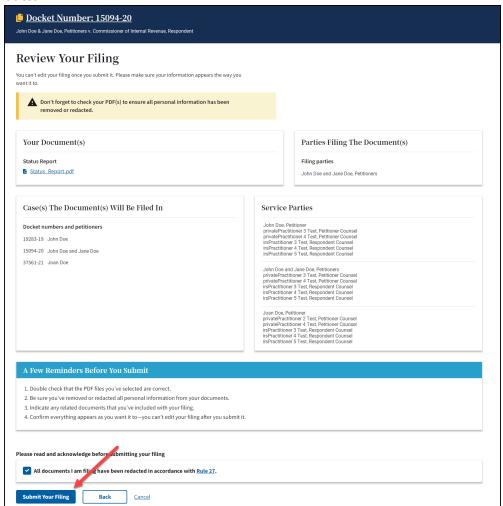
 i. Select the document that you are filing, upload the document, indicate who is filing the document(s), and then make a selection in the Which Cases Do You Want to File In? section.

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- ii. To file a document simultaneously in each case in the group, select the **All in the consolidated group** radio button.
- iii. Click the **Review Filing** button.

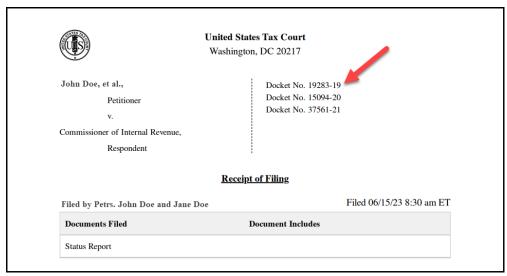
- iv. The **Review Your Filing** page includes 2 additional tiles that include information about which **Case(s)** the **Document(s)** Will Be Filed In and the **Service Parties** for each case.
- v. If the information is correct and you confirm that all documents are redacted in accordance with Rule 27, click the **Submit Your Filing** button.



vi. After submitting your filing, you will be routed back to the docket record of the case. A green confirmation banner that includes a print receipt is displayed.



vii. The Print receipt link is active for 2 minutes after submission. If you click on the print receipt, a new browser tab opens with a Receipt of Filing document that indicates the cases that the document(s) was filed in.



3. Sealed Cases in DAWSON, Generally

- a. If a case has been sealed by Court Order, the case is sealed in DAWSON.
- b. The docket record and all documents on the record of a sealed case, other than Opinions, are sealed from public view in DAWSON.
- c. Parties to a sealed case or their counsel may access the case through DAWSON and may eFile documents in DAWSON.

4. Sealing a Petition or Case

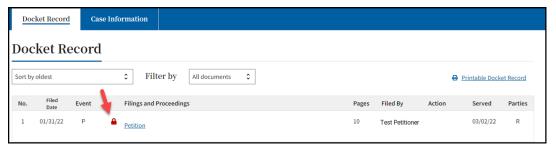
- a. Parties wishing to file a Petition under seal must file the Petition on paper along with a Motion to Seal. The Motion should specify whether it seeks to seal the entire case or only the Petition.
- b. Parties wishing to seal an existing case may electronically file a Motion to Seal

5. Filing Documents in a Sealed Case

- a. With the exception of an initial pleading or entry of appearance, parties may file documents in a sealed case in the same manner as filing documents in a case that is not sealed.
- b. If a case is already sealed, an initial filing (such as an Entry of Appearance) must be filed in paper. Once a party or counsel has been added to a case, the party or counsel may eFile documents in DAWSON.

6. Sealing Specific Documents

- a. Individual documents on the docket record can be sealed in two ways.
 - i. A document may be sealed from the public.
 - ii. A document may be sealed from both the public and from the parties to the case.
- b. Documents that have been sealed display the red lock icon next to the document title on the Docket Record. Hovering a mouse over the lock displays the level of seal (sealed from the public or sealed from the public and parties to the case).



- c. Parties wishing to seal a document that was already filed (e.g., after discovering missed redactions) may electronically file a Motion to Seal specifying whether the document is to be sealed from the public or from both the public and the parties.
- d. Parties wishing to file a new document under seal must file the document in paper along with a Motion to Seal specifying whether it is to be sealed from the public or both the public and the parties.
 - i. Example: Submitting a document for in camera review.

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INTERVENOR TO A CASE

An intervenor to a case is typically the non-requesting spouse in a section 6015 ("Innocent Spouse") case. If you represent a party that received a Notice of Filing of Petition and Right to Intervene from the IRS, follow the guidance below on how to gain access to the case.

NOTICE OF INTERVENTION

- 1. To gain access to the case, you must complete and file the Notice of Intervention. This form can be accessed here:
 - https://ustaxcourt.gov/resources/forms/Notice of Intervention Form 13.pdf
- 2. As a practitioner, you may file this form electronically, but note that DAWSON does not yet allow for you to select intervenor as the filing party. When filing the Notice of Intervention on behalf of the intervenor, select the petitioner as the filing party and the Court's Docket Section will correct it on the record after performing a quality review check of the filing.
- 3. After efiling the Notice of Intervention, a green confirmation banner is displayed, a print receipt is available, and a "Request for Access Pending" notification is displayed.



4. Alternatively, you may mail the completed form to:

United States Tax Court

400 Second St. NW

Washington, DC 20217

5. Once the form is processed by the Court, the intervenor will be added to the case and you will be added as counsel for intervenor.

ELECTRONIC SERVICE (ESERVICE)

Rule 21(b)(1)(D), Tax Court Rules of Practice and Procedure, authorizes service by electronic means if the person served consented in writing. Unless a practitioner has been granted an exemption from mandatory eFiling, the use of DAWSON constitutes consent to electronic service.

USING ESERVICE IN DAWSON

An eFiler may use DAWSON to electronically serve those parties or persons in the case who have consented to electronic service. A party's service preference is listed under their contact information on the Case Information tab within a case.

Each time a party eFiles a document, DAWSON generates a service notification email to all parties and persons in the case who have consented to electronic service. The service notification email in conjunction with the entry on the Court's electronic docket record constitutes service on all parties who have consented to electronic service. A certificate of service is not required with an eFiled document if all parties receive electronic service. Similarly, each time the Court issues a document in a case, a service notification email is generated to all parties who have consented to electronic service.

When you receive the Court's service notification email, you should log on to DAWSON to view/download the document(s). The document may also be saved or printed at this time. Practitioners are required to regularly log on to DAWSON to view any new activity in their case(s).

PAPER SERVICE

The filing party must make paper service on service parties who have not consented to electronic service. The filing party must also make paper service when filing a document with the Court in paper form. Certificates of service are required for paper service.

DOCUMENTS NOT ELIGIBLE FOR ESERVICE

Parties cannot use DAWSON to make service of documents that are not filed with the Court, such as discovery requests. The Court cannot serve documents that are not properly filed on the Docket Record.

BOUNCED ESERVICE

If the Court's service notification email to a pro se petitioner is returned (bounces back) to the Court's system as undeliverable, the Court will revoke the petitioner's electronic service and notify the eFiler, who must then serve the pro se petitioner in paper form and eFile a certificate of service in the case. The Court will also notify the pro se petitioner on whom eService failed and provide instructions for restoring eService. Electronic service is optional for self-represented petitioners, and they are not required to take further action unless they wish to eFile documents going forward.

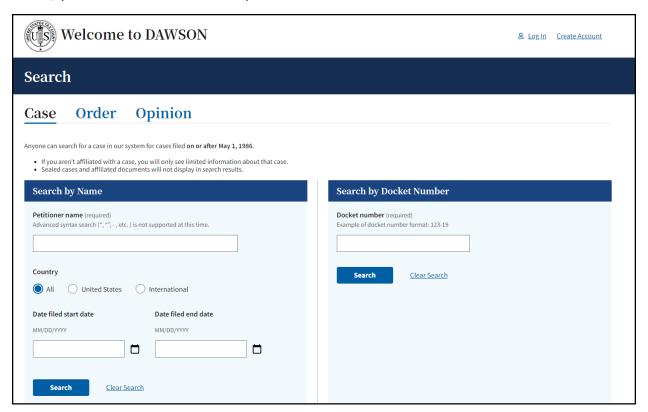
The Court does not monitor bounced-back emails from practitioners or provide paper service to practitioners unless they have been granted an exemption from mandatory

eFiling. To reduce the possibility of notifications being misclassified as spam or returned a undeliverable, practitioners should add the Court's domain "ustaxcourt.gov" to their email program's list of safe senders and update their email address in the event it changes.	
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FIND A CASE

To search for a case in DAWSON that is not one in which you have entered an appearance, you can click on the Advanced Search button on your dashboard if you are logged in.

If you are not logged in, go to the DAWSON homepage, https://dawson.ustaxcourt.gov/. There, you can search for a case by Petitioner Name or Docket Number on the Case tab.



SEARCH BY DOCKET NUMBER

- 1. To search for a case by Docket Number, you must include the dash in the Docket Number (e.g., 123-18).
- 2. You may, but do not have to, include the letter suffix (S, L, SL, R, X, D, or P) of the Docket Number to find a case.
- 3. When you enter a Docket Number that matches a case in the system, that case will display. If you enter a Docket Number that has no matching case, you will get a "No Matches Found" message.

SEARCH BY NAME

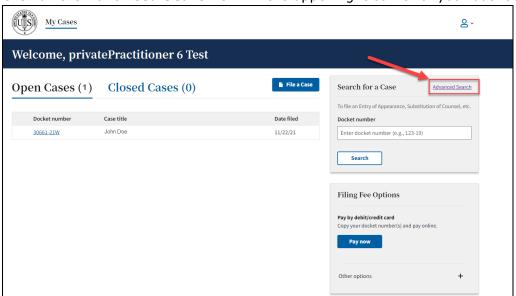
- 1. To search for a case by petitioner name, you must enter the petitioner's full or last name. Partial name searches (e.g., entering "Ron" for Ronald) are not currently supported.
- You can improve your search results by adding a date range for the Filed Date of the case, the Country, or the State. If the United States is selected, U.S. Territories and military bases are included.

FIND AN ORDER

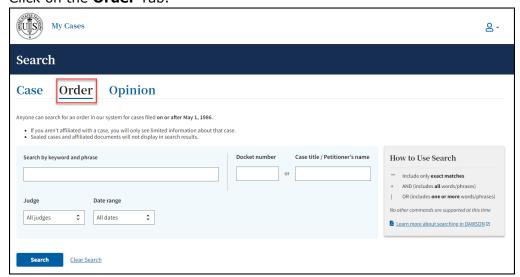
An order is a written direction or command issued by a Judge. Each day's orders are posted on the Court's website, www.ustaxcourt.gov, under "Today's Orders" in "Orders & Opinions". To search for an order, you can search by a keyword or phrase. In addition, you may also narrow your search results by adding in a specific Docket Number, Case Title/Petitioner's name, the Judge who issued the order, or by including a specific date or date range.

HOW TO SEARCH FOR AN ORDER

- 1. Log in to your DAWSON account.
- 2. Click on the Advanced Search URL in the upper right corner of your dashboard.



3. Click on the Order Tab.



- 4. Search orders with a keyword or phrase.
 - a. When search is initiated from the keyword or phrase area, DAWSON will include in the search:

- i. The case caption
- ii. The content of the order
- iii. The order title
- b. For exact matches, be sure to include quotation marks around your search term.
 - i. For example: Search "innocent spouse" for results containing that exact phrase.
 - ii. Do not enter quotation marks for searches that you do not want exact matches for.
 - iii. For example: If you enter **Smith** for your search, results will include terms that include **Smith**, as well as **Smithson**.
- 5. Use Connectors (| , +) with keywords/phrases.
 - a. You can use connectors in combination with the exact keyword or phrase search.

i. **OR (|)**

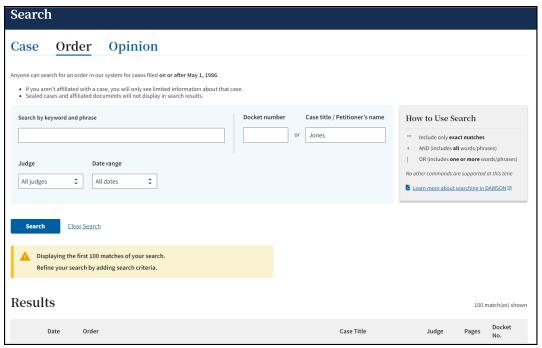
- 1. Use the | (pipe character) to find documents containing one or more of the keywords or phrases.
- 2. The pipe character (|) is usually located above the backslash (\) on your keyboard.
- 3. For example: Search Lien | Levy.

ii. AND (+)

- 1. Use the + (plus character) to find documents with two or more keywords or phrases
- For example: Search Motion for Summary Judgment + "Denied"
- 6. To search orders by Docket Number:
 - a. Enter a specific Docket Number to narrow searches to within a single Docket number.
- 7. To search orders by Case title or Petitioner name:
 - a. Enter a specific Case title or Petitioner name in the appropriate box.
- 8. To search orders by Judge:
 - a. Choose a specific Judge's Name from the drop-down menu.
 - b. Note: the default is all Judges.
- 9. To search orders by date:
 - a. The default is all dates, but you may also choose a custom date or date range.
 - b. When custom dates are selected, you must enter a start date, but you may choose to leave off the end date.

10. Total Results

a. After you click **Search or hit the enter key on your keyboard**, you will see how many search results are shown. In the example below, a Case Title search for Jones returned the first 100 matches. If the order that you are looking for is not in the first 100 matches, try to refine your search by adding additional search criteria (date ranges, a specific Judge, etc.).



b. DAWSON will only load the first 25 results on the page. If you would like to view more results than what initially is displayed, scroll to the bottom of the page, and click **Load more**.

TIPS & TRICKS

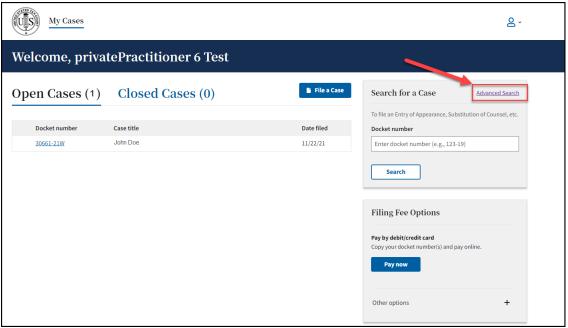
- Search is NOT case sensitive.
- If there are no matches, you will receive a message that states "No Matches Found. Check your search terms and try again."
- Additional help documentation is available on the DAWSON Order search page if needed.

FIND AN OPINION

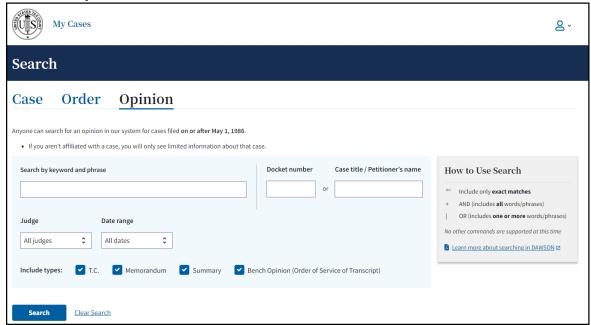
An opinion is the written determination of a Judge on the issues tried and submitted to the Court for decision. Each day's opinions are posted on the Court's website, www.ustaxcourt.gov, under "Orders & Opinions". If you need to search for an opinion, you can search by a keyword or phrase. In addition, you may narrow your search results by adding in a specific Docket number, Case Title/Petitioner's name, the Judge who issued the opinion, or by including a specific date or date range. You may also filter by opinion type.

HOW TO SEARCH FOR AN OPINION

- 1. Log in to your DAWSON account.
- 2. Click on the **Advanced Search** URL in the upper right corner of your dashboard.



3. Click the **Opinion** tab:

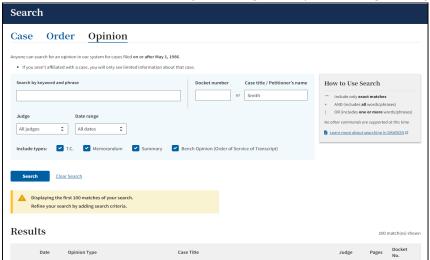


- 4. Search opinions with a keyword or phrase.
 - a. When search is initiated from the keyword or phrase area, DAWSON will include in the search:
 - i. The case caption.
 - ii. The content of the opinion.
 - iii. The opinion title.
 - b. For exact matches, be sure to include quotation marks around your search term.
 - i. For example: Search "Premium Tax Credit" for results containing that exact phrase.
 - c. Do not enter quotation marks for searches that you do not want exact matches for.
 - i. For example: If you enter **Smith** for your search, results will include terms that include **Smith**, as well as **Smithson**.
- 5. Use Connectors (| , +) with keywords/phrases.
 - a. You can use connectors in combination with the exact keyword or phrase search.
 - i. OR (|)
 - 1. Use the | (pipe character) to find documents containing one or more of the keywords or phrases.
 - 2. The pipe character (|) is usually located above the backslash (\) on your keyboard.
 - 3. For example: Search "fraud" | "sanctions".
 - ii. AND (+)
 - 1. Use the + (plus character) to find documents containing two or more keywords or phrases.
 - 2. For example: Search "in-kind + "distribution" + "IRA"
- 6. To search opinions by Docket Number:

- a. Enter a specific Docket Number to narrow searches to within a single Docket number.
- b. To search opinions by Case title or Petitioner name:
- c. Enter a specific Case title or Petitioner name to search for
- 7. To search opinions by Judge:
 - a. Enter a specific Judge's name.
 - b. Note: the default is all Judges.
- 8. To search opinions by date:
 - a. The default is all dates, but you may also choose a custom range of dates.
 - b. When custom dates are selected, you must enter a start date, but you may choose to leave off the end date.
- 9. To search opinions by Opinion Type:
 - a. The default is all opinion types.
 - b. Uncheck the opinion types that you do not want so that only the opinion types that you want to search for are left checked.

10. Total Results

a. After you click **Search or hit the enter key on your keyboard**, you will see how many search results are shown. In the example below, a keyword search for Smith returned the first 100 matches. If the opinion that you are looking for is not in the first 100 matches, try to refine your search by adding in additional search criteria (date ranges, a specific Judge, etc.).



b. DAWSON will only load the first 25 results on the page. If you would like to view more results than what initially is displayed, scroll to the bottom of the page, and click **Load more**.

TIPS & TRICKS

- Search is NOT case sensitive.
- If there are no matches, you will receive a message that states "No Matches Found. Check your search terms and try again."
- Additional help documentation is available on the DAWSON Opinion search page if needed.

ADDITIONAL RESOURCES

- Terms of Use: https://www.ustaxcourt.gov/tou.html
- Notice Regarding Privacy and Public Access to Case Files: https://www.ustaxcourt.gov/notice_regarding_privacy.html
- Frequently Asked Questions: https://ustaxcourt.gov/dawson-fags.html
- Glossary: https://www.ustaxcourt.gov/petitioners glossary.html
- Tax Court Rules of Practice and Procedure: https://ustaxcourt.gov/rules.html
- Guidance for Practitioners: https://www.ustaxcourt.gov/practitioners.html
- Case Related Forms: https://ustaxcourt.gov/case-related-forms.html
- COVID-19 Resources: https://www.ustaxcourt.gov/covid.html

ADDITIONAL SUPPORT

Still have a question or a problem?

- Email <u>dawson.support@ustaxcourt.gov</u>.
- No documents can be filed with the Court at this email address.

SYSTEM STATUS

For information regarding system status, including outages, please visit: https://status.ustaxcourt.gov/.