

Pursuant to Tax Court Rule 50(f), orders shall not be treated as precedent, except as otherwise provided.

UNITED STATES TAX COURT
WASHINGTON, DC 20217

| | | |
|-----------------------------------|---|------------------------|
| ALVERA P. JOHNSON, |) | |
| |) | |
| Petitioner, |) | ALS |
| |) | |
| v. |) | Docket No. 17841-16 L. |
| |) | |
| COMMISSIONER OF INTERNAL REVENUE, |) | |
| |) | |
| Respondent |) | |
| |) | |

ORDER

This case is calendared for trial at the San Diego, California Session of the Court commencing November 13, 2017. On September 14, 2017, respondent filed a Motion for Summary Judgment, together with a Declaration of Michael S. Hensley (an attorney employed by the Office of Chief Counsel, Internal Revenue Service) in support of respondent’s motion. Respondent’s motion does not state if petitioner objects to the Court’s granting respondent’s motion.

The premises considered, it is hereby

ORDERED that on or before October 13, 2017, petitioner shall file a response to respondent’s Motion for Summary Judgment stating any objections to the Court’s granting the motion. In the event petitioner fails to respond to respondent’s motion by October 13, 2017, the Court may grant respondent’s motion and enter a decision for respondent.

(Signed) Julian I. Jacobs
Judge

Dated: Washington, D.C.
September 15, 2017

SERVED Sep 15 2017