

UNITED STATES TAX COURT
WASHINGTON, DC 20217

TRILOGY, INC. & SUBSIDIARIES,)	
)	
Petitioners,)	
)	
v.)	Docket No. 12097-16.
)	
COMMISSIONER OF INTERNAL REVENUE,)	
)	
Respondent)	

ORDER

On April 20, 2018, respondent filed a motion (ECF 25) for an order striking a paragraph from the parties' stipulation filed March 26, 2018. Although the motion is entitled "Respondent's Motion for Leave to File Amended First Stipulation of Facts", no such amended stipulation was submitted with the motion (and evidently none exists, since the motion states that petitioners object to the motion), and the relief sought by such a motion for leave would be granted only if the motion to strike were first granted. It is therefore

ORDERED that respondent's motion shall be recharacterized as respondent's motion for an order striking paragraph 38 from the stipulation filed March 26, 2018. It is further

ORDERED that no later than May 7, 2018, petitioners shall file a response to respondent's motion. In formulating their position, petitioners shall give due attention to the Court's order issued April 12, 2018 (ECF 23). It is further

ORDERED that respondent shall file a reply no later than May 14, 2018.

(Signed) David Gustafson
Judge

Dated: Washington, D.C.
April 23, 2018

SERVED Apr 23 2018