

UNITED STATES TAX COURT
WASHINGTON, DC 20217

JEREMIAH FRANCIS MANNING,)	
)	
Petitioner,)	
)	
v.)	Docket No. 22609-17.
)	
COMMISSIONER OF INTERNAL REVENUE,)	
)	
Respondent)	

ORDER

This case was previously calendared for trial on November 26, 2018, in New York, New York. On November 15, 2018, this case was continued for trial, and jurisdiction was retained by the undersigned.

On February 14, 2019, petitioner filed a motion for extension of time, in which petitioner requests that the Court extend the time within which petitioner shall provide to respondent's counsel any and all documents or other materials as ordered by the Court's order dated November 15, 2018. Also, on February 14, 2019, respondent and petitioner each filed a status report.

The Court notes that pursuant to the order dated November 15, 2018, petitioner was ordered to provide to respondent's counsel on or before January 31, 2019, any and all documents or other materials that petitioner wished to rely upon in support of his case. The Court's order dated November 15, 2018, also stated that unless otherwise ordered by the Court, petitioner would not be entitled to rely upon or introduce into evidence documents or other materials that were not provided to respondent's counsel by January 31, 2019. Petitioner indicates in his motion for extension of time filed February 14, 2019, that his request for an extension is warranted by the shutdown of the Federal government without detailing how the shutdown affected his ability to provide respondent's counsel the documents or other materials as ordered by the Court's order dated November 15, 2018. The Federal government reopened on January 28, 2019, and petitioner's motion is silent as to his efforts to provide the documents or other materials to respondent's counsel at any time before the filing of petitioner's motion on

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February 14, 2019. Nevertheless, giving petitioner the benefit of the doubt, we shall provide a short extension of time for the parties to exchange information. The Court does not contemplate granting further extensions.

Upon due consideration of the forgoing, it is

ORDERED: That petitioner's motion for extension of time filed February 14, 2019, is granted in that the time within which petitioner shall provide to respondent's counsel any and all documents or other materials that petitioner wishes to rely upon in support of his case is extended to and including March 4, 2019; unless otherwise ordered by the Court, petitioner shall not be entitled to rely upon or introduce into evidence documents or other materials that are not provided to respondent's counsel by March 4, 2019. It is further

ORDERED: That, on or before March 18, 2019, the parties shall file a status report, preferably joint, indicating the then-present status of this case. It is further

ORDERED: That, on or before April 1, 2019, the parties shall file a stipulation of facts. It is further

ORDERED: That this case is calendared for trial at the trial session of the Court scheduled to commence on April 15, 2019, in Room 206, Jacob K. Javits Federal Building, 26 Federal Plaza, New York, New York, 10278. It is further

ORDERED: That the Clerk of the Court is directed to attach to this order a copy of the standing pretrial order for the April 15, 2019, New York, New York, trial session. It is further

ORDERED: That the Court's standing pretrial order for the April 15, 2019, New York, New York, trial session, remains in full force and effect except insofar as ordered differently herein.

This order constitutes official notice of the same to the parties herein.

(Signed) Michael B. Thornton
Judge

Dated: Washington, D.C.
February 15, 2019