

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

PA

| | | |
|-----------------------------------|---|-----------------------|
| TRANSUPPORT, INC., |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | Docket No. 16422-18 L |
| |) | |
| COMMISSIONER OF INTERNAL REVENUE, |) | |
| |) | |
| Respondent. |) | |

ORDER

Because petitioner’s motion to strike, filed November 13, 2018, fails to demonstrate that the allegation contained in subparagraph oo of paragraph 5 of respondent’s answer could have no possible bearing upon whether respondent’s determination to proceed with collection of petitioner’s outstanding 2006, 2007 and/or 2008 Federal income tax liabilities is an abuse of discretion, see Estate of Jephson v. Commissioner, 81 T.C. 999 (1983), it is

ORDERED that petitioner’s motion is denied.

(Signed) Lewis R. Carluzzo
Special Trial Judge

Dated: Washington, D.C.
June 19, 2019

SERVED Jun 20 2019