

UNITED STATES TAX COURT  
WASHINGTON, DC 20217

SIRIUS XM CONNECTED VEHICLE	)	
SERVICES HOLDINGS INC. AND	)	
SUBSIDIARIES F.K.A. AGERO HOLDINGS	)	
INC. F.K.A. CCAS HOLDINGS, INC. AND	)	
SUBSIDIARIES CONSOLIDATED GROUP,	)	
	)	
Petitioner(s),	)	
	)	
v.	)	Docket No. 17641-18.
	)	
COMMISSIONER OF INTERNAL REVENUE,	)	
	)	
Respondent	)	

**ORDER**

This case is currently calendared for trial at the Court’s December 2, 2019, Boston, Massachusetts, trial session. On October 11, 2019, the undersigned held a conference call with the parties, in which the parties agreed that a decision on summary judgment could substantially narrow or entirely resolve key issues in the case.

In consideration of the foregoing, it is

ORDERED that this case is stricken from the Court’s December, 2, 2019, Boston, Massachusetts, trial session, and is continued. It is further

ORDERED that jurisdiction is retained by this division of the Court. It is further

ORDERED the parties are no longer bound by the pre-trial schedule set forth in the Notice Setting Case for Trial, dated July 2, 2019. It is further

ORDERED that petitioner shall file, on or before November 22, 2019, a motion for summary judgment with supporting memorandum. It is further

**SERVED Oct 22 2019**

ORDERED that respondent shall file, on or before January 14, 2020, a response to petitioner's motion for summary judgment. If respondent elects to file a cross-motion for summary judgment, then the response he files on January 14, 2020, shall include his arguments in support of his cross-motion as well as his arguments in response to petitioner's motion. It is further

ORDERED that petitioner may file, on or before February 13, 2020, a single reply to respondent's response as set forth in the preceding paragraph. It is further

ORDERED that respondent may file, on or before February 27, 2020, a sur-reply to petitioner's reply as set forth in the preceding paragraph.

**(Signed) Albert G. Lauber  
Judge**

Dated: Washington, D.C.  
October 21, 2019