

**UNITED STATES TAX COURT  
DOCKET ENTRIES**

**Docket No.** 026683-09

**INDEX**

Bank of New York Mellon Corporation, as Successor in Interest to The Bank of New York Company Inc.  
v. COMMISSIONER OF INTERNAL REVENUE

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NO.	DATE	EVENT	FILINGS AND PROCEEDINGS	ACT/STAT DTE	SERVED	M
0001	11/10/2009	PF	PETITION Filed:Fee Paid		R 11/17/2009	
0002	11/10/2009	REQT	REQUEST for Place of Trial at New York, NY		R 11/17/2009	
0003	01/19/2010	ACS	ANSWER (C/S 01/15/10).			
0004	02/16/2010	AA	AMENDED ANSWER (C/S 2/8/10)			
0005	03/09/2010	R	REPLY by petr.		R 03/11/2010	
0006	03/16/2010	JMOT	JOINT MOTION for assignment of Judge.	ORD 10/01/2010		
0007	03/26/2010	EA	ENTRY OF APPEARANCE by Kristin R. Keeling.		R 03/29/2010	
0008	04/19/2010	EA	ENTRY OF APPEARANCE by Andrew J. McLean.		R 04/21/2010	
0009	09/28/2010	EA	ENTRY OF APPEARANCE by Daniel C. Davis.		R 10/04/2010	
0010	10/01/2010	OAJ	ORDER that case is assigned to Judge Goeke. Granting jt. motion for assignment.		B 10/04/2010	
0011	10/22/2010	O	ORDER set 12/5/11 New York, NY special for trial.		B 10/25/2010	
0012	12/02/2010	EA	ENTRY OF APPEARANCE by Melissa R. Middleton.		R 12/07/2010	
0013	12/27/2010	JT	JOINT REPORT on Agreed Pre-Trial Schedule.			
0014	01/05/2011	O	ORDER parties by the dates contained herein comply with scheduled deadlines.		B 01/06/2011	

NO.	DATE	EVENT	FILINGS AND PROCEEDINGS	ACT/STAT DTE	SERVED	M
 0015	05/20/2011	STP	STIPULATION TO TAKE DEPOSITIONS of Thomas Price & Thomas Mastro. (Per Judge)			
 0016	05/24/2011	OAJ	ORDER that case is assigned to Judge Kroupa . Case is no longer assigned to Judge Goeke. Special trial is continued. 1/5/11 order is vacated.		B 05/25/2011	
 0017	06/10/2011	EA	ENTRY OF APPEARANCE by Manoj Viswanathan.		R 06/16/2011	
 0018	06/10/2011	EA	ENTRY OF APPEARANCE by Ilana A. Yergin.		R 06/16/2011	
 0019	06/16/2011	JRPT	JOINT REPORT on agreed pre-trial schedule. (Per Judge)			
 0020	07/05/2011	STP	STIPULATION to take depositions of Michael Brice, Gregory Warnke, Monique Lipton, Robert Brady & Thomas Gibbons.			
 0021	07/08/2011	O	ORDER set 4/16/12 New York, NY Special for trial. Parties are to comply with the pretrial deadlines contained herein.		B 07/12/2011	
 0022	08/19/2011	STP	STIPULATION to take deposition of John Park.			
 0023	08/19/2011	JMOT	JOINT MOTION to revise 7/8/11 order to extend time to 10/21/11 for the filing of the stipulation of facts.	ORD 08/25/2011		
 0024	08/25/2011	O	ORDER joint motion to revise 7/8/11 order is granted in that parties submit a stipulation of facts by 10/21/11. Court's 7/8/11 order in all other respects remains in full force & effect.		B 08/26/2011	
 0025	09/12/2011	STP	STIPULATION to take Deposition of John Scordia, New York, NY. (per Judge)			
 0026	10/07/2011	EA	ENTRY OF APPEARANCE by Alan J.J. Swirski.		R 10/13/2011	
 0027	10/07/2011	EA	ENTRY OF APPEARANCE by Shira M. Helstrom.		R 10/13/2011	
 0028	10/17/2011	STP	STIPULATION to take deposition of Wilson Mastrandrea.			
 0029	10/21/2011	JMOT	JOINT MOTION to revise 8/24/11 order to extend time to 11/21/11 for the filing of the stipulation of facts.	GR 10/24/2011	B 10/25/2011	
 0030	11/21/2011	JMOT	JOINT MOTION to revise pre-trial order to extend time to 12/12/11 for the filing of the stipulation of facts. (Per Judge)	GR 11/28/2011	B 11/28/2011	
 0031	11/21/2011	STP	STIPULATION to take deposition of Maryann Watt. (Per Judge)			
 0032	11/21/2011	STP	STIPULATION OF FACTS. w/Exs. (Per Judge)			
 0033	11/29/2011	MOTR	MOTION by resp. to compel the deposition of nonparty witness Ernst & Young LLP. w/Exs. (C/S 11/29/11)	ORD 01/31/2012		
 0034	11/30/2011	JMOT	JOINT MOTION to extend deadline for petr. to respond to formal discovery requests & to revise pretrial order to extend deadline for resp. to file motions to compel discovery with respect to petr's formal discovery responses.	GR 12/05/2011	B 12/06/2011	
 0035	12/05/2011	MOT	MOTION by Non-party Ernst & Young LLP's for leave to file a response by 12/9/11 to resp. motion to take deposition of non-party witness Ernst & Young LLP. (C/S 12/5/11)	ORD 12/09/2011		
 0036	12/09/2011	O	ORDER Non-Party & petr. by 12/27/11 file responses to resp. motion to compel deposition of non-party. Non-party Ernst & Young's motion for leave to file a response to resp. motion to compel deposition is granted. Additional service on Non-party, care of their counsel, as stated herein.		B 12/09/2011	









NO.	DATE	EVENT	FILINGS AND PROCEEDINGS	ACT/STAT DTE	SERVED	M
 0037	12/12/2011	AMD	AMENDED STIPULATION OF FACTS. w/Exs. (Per Judge)			
 0038	12/15/2011	MOTR	MOTION by resp. to compel the deposition of nonparty witness David Brockway. w/Exs. (C/S 12/15/11 on deponent) (WITHDRAWN)	ORD 01/31/2012	P 12/20/2011	
 0039	12/15/2011	MOTR	MOTION by resp. for a pretrial conference. (N.OBJ.)	ORD 01/31/2012	P 12/20/2011	
 0040	12/16/2011	MOTR	MOTION by resp. to file out of time motion to show cause under Rule 91(f). (C/S 11/29/11)	DN 05/04/2012	B 05/11/2012	
 0041	12/16/2011	MISL	MOTION by resp. to show cause under Rule 91(f)-Lodged. w/Exs.		P 12/20/2011	
 0042	12/23/2011	MOTR	MOTION by resp. to compel production of documents. w/Exs.	ORD 01/31/2012	P 12/27/2011	
 0043	12/27/2011	OP	OPPOSITION by petr. to resp. motion to compel the deposition of nonparty witness Ernst & Young LLP. w/Exs. (C/S 12/27/11 on counsel for nonparty witness)		R 12/28/2011	
 0044	12/27/2011	RESP	RESPONSE by Non-Party Ernst & Young LLP's Response to resp. motion to compel the deposition of Non-Party witness Ernst & Young LLP. W/Ex. (C/S 12/27/11)			
 0045	01/17/2012	OP	OPPOSITION by petr. to resp. motion to compel the deposition of Nonparty witness David Brockway. w/Exs. (C/S 1/17/12)		R 01/18/2012	
 0046	01/17/2012	RESP	RESPONSE by petr. to resp. motion for a pretrial conference. w/Exs.		R 01/18/2012	
 0047	01/18/2012	OP	OPPOSITION by petr. to resp. motion to compel production of documents.		R 01/18/2012	
 0048	01/18/2012	MOTR	MOTION by resp. for leave to file a response to objections of petitioner & nonparty Ernst & Young LLP to resp. motion to compel the deposition of nonparty witness ernst & Young LLP.	GR 01/18/2012	P 01/18/2012 B 01/20/2012	
 0049	01/18/2012	MISL	Resp. response to objections of petr. & nonparty Ernst & Young LLP to resp. motion to compel the deposition of nonparty . (C/S 1/18/12 on Counsel for deponent only) -- LODGED		P 01/18/2012	
 0050	01/18/2012	RESP	RESPONSE by resp. to objections of petr. & nonparty Ernst & Young LLP to resp. motion to compel the deposition of nonparty .		B 01/20/2012	
 0051	01/18/2012	EA	ENTRY OF APPEARANCE by Brendan O'Dell.		R 01/20/2012	
 0052	01/18/2012	EA	ENTRY OF APPEARANCE by Bryon Christensen.		R 01/20/2012	
 0053	01/19/2012	MISC	Second Stipulation of Facts (per Judge) Recharacterized as Second Amended Stipulation of Facts			
 0054	01/23/2012	MOTR	MOTION by resp. for Leave to File a Response to Petr. Response to Resp. Motion for Pretrial Conference.	GR 01/24/2012	B 01/24/2012	
 0055	01/23/2012	MISL	Resp. Response to Petr. Response to Resp. Motion for a Pretrial Conference. -- LODGED		P 01/24/2012	
 0056	01/24/2012	RESP	RESPONSE by Resp. to Petr. Response to resp. Motion for a Pretrial Conference. (Per Judge)		B 01/24/2012	

NO.	DATE	EVENT	FILINGS AND PROCEEDINGS	ACT/STAT DTE	SERVED	M
 0057	01/31/2012	O	ORDER resp. motion for pretrial conference is granted. Resp. motion to compel deposition of nonparty witness Ernst & Young is denied. Resp. motion to compel the deposition of nonparty witness David Brockway is deemed withdrawn. Resp. motion to compel production of documents is granted in part & denied in part. Second Stipulation of Facts is recharacterized as Second Amended Stipulation of Facts. Additional service as stated herein.		B 02/02/2012	
 0058	02/13/2012	STP	STIPULATION to take deposition of Anthony Saunders, Steven Schwartz, Gerald Hanweck, Sr., Edward Cipullo, Michael Cragg, W. Clifford Atherton, Jr., & David Ross.			
 0059	02/27/2012	STP	STIPULATION to take deposition of David England to perpetuate testimony.			
 0060	02/27/2012	STP	STIPULATION to take depositions of Philip Baker, Michael Brindle, & Julian Ghosh.			
 0061	02/28/2012	EA	ENTRY OF APPEARANCE by John P. Marston.		R 02/29/2012	
 0062	03/01/2012	STP	STIPULATION to take depositions of Sohail Sultan, London, U.K. & Alkis Ioannidis, London, U.K.			
 0063	03/12/2012	JMOT	JOINT MOTION to revise pre-trial order to extend deadlines to file pre-trial memoranda, identify trial exhibits, file motions in limine & opposition to motions in limine.	ORD 03/14/2012		
 0064	03/14/2012	O	ORDER joint motion to revise filed 3/12/12 is granted in that the date for the parties to submit their pretrial memorandum is extended to 3/27/12, file & serve motions in limine is extended to 3/30/12 & to file any opposition to the motions in limine is extended to 4/5/12. In all other respects, the order dated 7/8/11, as modified 8/25/11 remains in full force & effect.		B 03/14/2012	
 0065	03/26/2012	MOTP	MOTION by petr. in limine to exclude rebuttal testimony of Edward L. Cipullo. w/Exs.	ORD 04/16/2012	R 03/27/2012	
 0066	03/28/2012	PTM	PRE-TRIAL MEMORANDUM for Resp. (C/S 3/27/12)			
 0067	03/28/2012	PTM	PRE-TRIAL MEMORANDUM for Petr. (C/S 3/27/12)			
 0068	03/30/2012	MOTR	MOTION by resp. in limine to exclude the rebuttal expert witness report of Julian Ghosh QC. w/Exs.	ORD 04/16/2012	P 04/02/2012	
 0069	03/30/2012	MOTP	MOTION by petr. in limine to exclude the expert testimony of Dr. Michael I. Cragg. w/Exs.	ORD 04/16/2012	R 04/02/2012	
 0070	04/02/2012	MOTP	MOTION by petr. in limine to exclude certain exhibits & stipulations on relevance grounds. w/Exs. (C/S 3/30/12) (per Judge)	ORD 04/16/2012		
 0071	04/02/2012	MOTP	MOTION by petr. to quash subpoenas served on John Schordia, Gregory Warnke & Maryann Watt. w/Exs.	ORD 04/16/2012	R 04/03/2012	
 0072	04/02/2012	MOTP	MOTION by petr. to quash subpoenas served on American International Group, Inc., Microsoft Corporation & Prudential Insurance Company of America. w/Exs.	ORD 04/16/2012	R 04/05/2012	
 0073	04/04/2012	MOTP	MOTION by petr. to Quash Subpoenas served on Gerald Hassell & Thomas Renyi. w/Ex.	ORD 04/20/2012	R 04/05/2012	
 0074	04/05/2012	O	ORDER resp. by 4/11/12 file & serve on petr. a response or an objection to petr. motions to quash subpoenas filed 4/2/12 & 4/4/12. (Additional service of this order made on subpoenaed parties)		B 04/05/2012	















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 0075	04/05/2012	OP	OPPOSITION by Petr. to resp. motion in limine to exclude the rebuttal report of Julian Ghosh QC. w/Exs.		R 04/06/2012	
 0076	04/05/2012	OBJ	OBJECTION by Resp. to petr. motion in limine to exclude rebuttal testimony of Edward L. Cipullo.		P 04/06/2012	
 0077	04/05/2012	OBJ	OBJECTION by Resp. to petr. motion in limine to exclude the expert testimony of Dr. Michael I. Cragg. w/Declaration w/ex. att.		P 04/06/2012	
 0078	04/05/2012	OBJ	OBJECTION by Resp. to petr. motion in limine to exclude certain exhibits and stipulations on relevance grounds. w/Exs.		P 04/06/2012	
 0079	04/10/2012	MOT	MOTION by Non-Party American International Group, Inc. to Quash Subpoena Duces Tecum. w/Exs. & Affidavit attached. (Per Judge) (C/S 4/10/12)	ORD 04/16/2012		
 0080	04/10/2012	MOT	MOTION by Non-Party American International Group, Inc. for Protective Order Regarding Subpoena Duces Tecum. w/Exs. & Affidavit attached. (Per Judge) (C/S 4/10/12)	ORD 04/16/2012		
 0081	04/11/2012	OBJ	OBJECTION by resp. to petr. motion to quash subpoenas served on John Schordia, Gregory Warnke & Maryann Watt.		P 04/12/2012	
 0082	04/11/2012	OBJ	OBJECTION resp. to petr. motion to quash subpoenas served on American International Group, Inc., Microsoft Corporation & Prudential Insurance Company of America.		P 04/12/2012	
 0083	04/11/2012	OBJ	OBJECTION by resp. to petr motion to quash subpoenas served on Gerald Hassell & Thomas Renyi.		P 04/12/2012	
 0084	04/12/2012	SUPL	SUPPLEMENT by petr. to motion in limine to exclude the expert testimony of Michael I. Cragg. w/Attachment (Per Judge)		R 04/13/2012	
 0085	04/16/2012	PTRL	PARTIAL TRIAL before Judge Kroupa at New York, NY Recalled 4/17/12, 4/18/12, 4/19/12, 4/20/12, 4/23/12, 4/24/12, 4/25/12, 4/26/12, 4/30/12, 5/1/12, 5/2/12, 5/3/12 & 5/4/12 Resp. motion to file 91(f) motion filed 12/16/11--Denied as Moot; Petr. motion in limine filed 3/26/12, Resp. motion in limine filed 3/30/12, Petr. motion in limine filed 3/30/12, Petr. motion in limine filed 4/2/12, Petr. motions to quash subpoenas filed 4/2/12 & 4/4/12, American International Group, Inc. Motions to quash subpoena & protective order filed 4/10/12, 4/17/12 Manoj Viswanathan's motion to withdraw as counsel filed 4/17/12--See Orders; 4/17/12 Petr. oral motion to withdraw Manoj Viswanathan Motions to withdraw as counsel--See Order; 4/20/12 Petr. oral motion to quash subpoenas served on Gerald Hassell & Thomas Renyi--See Order; 5/1/12 Petr. oral motion to exclude the opening & rebuttal reports of David J. Ross & to prohibit Mr. Ross from testifying--See Order; 5/3/12 Resp. oral motion to withdraw resp. motion for a ruling that stipulated exhibits are authentic--See Order; 5/3/12 Kristin R. Kelling withdraw as counsel--See Order; 5/4/12 Continued--See Order; OPENING BRIEFS DUE: 7/16/12; ANSWERING BRIEFS DUE: 9/13/12 (Special instructions on all briefs including number of pages)		B 04/17/2012	

NO.	DATE	EVENT	FILINGS AND PROCEEDINGS	ACT/STAT DTE	SERVED	M
 0086	04/16/2012	MISC	THIRD STIPULATION OF FACTS. w/Appendix & Exs. (Exs. not scanned)			
 0087	04/16/2012	SUPL	SUPPLEMENT TO THIRD STIPULATION OF FACTS. w/Exs. (Exs. Not Scanned)			
 0088	04/16/2012	O	ORDER petr. motion in limine to exclude rebuttal testimony of Edward L. Cipullo is granted.		B 05/11/2012	
 0089	04/16/2012	O	ORDER resp. motion in limine to exclude the rebuttal expert witness report of Julian Ghosh QC is denied.		B 05/11/2012	
 0090	04/16/2012	O	ORDER petr. motion in limine to exclude the expert testimony of Dr. Michael I. Cragg, as supplemented is denied.		B 05/11/2012	
 0091	04/16/2012	O	ORDER petr. motion in limine to exclude certain exhibits & stipulations on relevance grounds is denied.		B 05/11/2012	
 0092	04/16/2012	O	ORDER petr. motion to quash subpoenas served on John Scordia, Gregory Warnke & Maryann Watt is granted. Additional service of this order is served on B. John Williams, Jr. at address stated herein.		B 05/11/2012	
 0093	04/16/2012	O	ORDER petr. motion to quash subpoenas served on American International Group, Inc., Microsoft Corporation & Prudential Insurance Company of America is granted. Additional service of this order is made on persons stated herein. (R-M-In F 6/8/12 Per Judge)		B 05/11/2012	
 0094	04/16/2012	O	ORDER Non-Party American International Group, Inc.'s motion to quash subpoena duces tecum is denied as moot. Non-Party American International Group, Inc.'s motion for protective order regarding subpoena duces tecum is granted. Additional service of this order is made on Thomas A. Cullinan at address stated herein. (R-M- In File 6/8/12 Per Judge)		B 05/11/2012	
 0095	04/17/2012	MOT	MOTION by Manoj Viswanathan to withdraw as counsel. (withdrawn)	ORD 04/17/2012	B 04/17/2012	
 0096	04/17/2012	O	ORDER petr. oral motion to withdraw Manoj Viswanathan's motion to withdraw as counsel is granted.		B 05/11/2012	
 0097	04/20/2012	O	ORDER petr. motion & oral motions to quash subpoenas served on Gerald Hassell & Thomas Renyi are denied. Additional service of this order is made on B. John Williams, Jr. at address stated herein.		B 05/11/2012	
 0098	04/24/2012	TRAN	TRANSCRIPT of 4/16/12 rec'd. (PTRL) Vol. 1			
 0099	04/24/2012	TRAN	TRANSCRIPT of 4/16/12 rec'd. (PTRL) Vol. 2			
 0100	04/24/2012	TRAN	TRANSCRIPT of 4/17/12 rec'd. (PTRL) Vol. 3			
 0101	04/24/2012	TRAN	TRANSCRIPT of 4/17/12 rec'd. (PTRL) Vol. 4			
 0102	04/24/2012	TRAN	TRANSCRIPT of 4/18/12 rec'd. (PTRL) Vol. 5			
 0103	04/24/2012	TRAN	TRANSCRIPT of 4/18/12 rec'd. (PTRL) Vol. 6			
 0104	04/24/2012	TRAN	TRANSCRIPT of 4/19/12 rec'd. (PTRL) Vol. 7			
 0105	04/24/2012	TRAN	TRANSCRIPT of 4/19/12 rec'd. (PTRL) Vol. 8			
 0106	04/24/2012	TRAN	TRANSCRIPT of 4/20/12 rec'd. (PTRL) Vol. 9			
 0107	04/24/2012	TRAN	TRANSCRIPT of 4/20/12 rec'd. (PTRL) Vol. 10			
 0108	04/25/2012	MEMO	MEMORANDUM OF LAW by resp. in support of resp's. offer of the testimony of Sohail Sultan.		P 05/11/2012	

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 0109	04/26/2012	RESP	RESPONSE by petr. to resp. memorandum of law in support of resp. offer of the testimony of Sohail Sultan.		R 05/11/2012	
 0110	05/01/2012	O	ORDER petr. oral motion to exclude the opening & rebuttal reports of resp's. expert witness David J. Ross & to prohibit Mr. Ross from testifying is denied in part & granted in part as stated herein.		B 05/11/2012	
 0111	05/01/2012	MOTR	MOTION by resp. for a ruling that stipulated exhibits are authentic. (withdrawn)	ORD 05/03/2012	P 05/11/2012	
 0112	05/03/2012	O	ORDER resp. oral motion to withdraw resp. motion for a ruling that stipulated exhibits are authentic is granted.		B 05/11/2012	
 0113	05/03/2012	O	ORDER that on the Court's own motion, Kristin R. Keeling is deemed withdrawn as counsel of record.		B 05/11/2012	
 0114	05/03/2012	TRAN	TRANSCRIPT of 4/23/12 rec'd. (PTRL) Vol. 11			
 0115	05/03/2012	TRAN	TRANSCRIPT of 4/24/12 rec'd. (PTRL) Vol. 12			
 0116	05/03/2012	TRAN	TRANSCRIPT of 4/24/12 rec'd. (PTRL) Vol. 13			
 0117	05/03/2012	TRAN	TRANSCRIPT of 4/25/12 rec'd. (PTRL) Vol. 14			
 0118	05/03/2012	TRAN	TRANSCRIPT of 4/26/12 rec'd. (PTRL) Vol. 15			
 0119	05/03/2012	TRAN	TRANSCRIPT of 4/30/12 rec'd. (PTRL) Vol. 16			
 0120	05/03/2012	TRAN	TRANSCRIPT of 4/30/12 rec'd. (PTRL) Vol. 17			
 0121	05/03/2012	TRAN	TRANSCRIPT of 5/1/12 rec'd. (PTRL) Vol. 18			
 0122	05/03/2012	TRAN	TRANSCRIPT of 5/1/12 rec'd. (PTRL) Vol. 19			
 0123	05/04/2012	O	ORDER that this case is continued to 5/17/12 Washington, D.C. Special for further trial for the limited purpose of hearing closing arguments.		B 05/11/2012	
 0124	05/09/2012	TRAN	TRANSCRIPT of 5/2/12 rec'd. (PTRL) Vol. 20			
 0125	05/09/2012	TRAN	TRANSCRIPT of 5/3/12 rec'd. (PTRL) Vol. 21			
 0126	05/09/2012	TRAN	TRANSCRIPT of 5/4/12 rec'd. (PTRL) Vol. 22			
 0127	05/17/2012	FTRL	FURTHER TRIAL before Judge Kroupa at Washington, DC OPENING BRIEFS DUE 7/16/12 . ANSWERING BRIEFS DUE 9/13/12. (Special instructions on all briefs including number of pages) SUBMITTED TO JUDGE KROUPA.	SUB 05/17/2012		
 0128	05/18/2012	TRAN	TRANSCRIPT of 5/17/12 rec'd. (PTRL) Vol. 23			
 0129	07/16/2012	BFP	BRIEF for petr. (Per Judge)		R 07/18/2012	
 0130	07/17/2012	BFR	BRIEF for resp. (Per Judge)		P 07/18/2012	
 0131	07/25/2012	MOTR	MOTION by resp. for leave to file an amended opening brief.	GR 07/27/2012	P 07/27/2012 B 07/30/2012	
 0132	07/25/2012	MISL	Amended Opening brief by resp. -- LODGED		P 07/27/2012	
 0133	07/27/2012	ABRF	AMENDED BRIEF by resp.		P 07/30/2012	
 0134	09/12/2012	NCA	NOTICE of Change of Address for petr. counsel Julia Kazaks.		R 09/13/2012	
 0135	09/13/2012	RBFP	REPLY BRIEF for petr. (Per Judge)		R 09/14/2012	
 0136	09/13/2012	RBFR	REPLY BRIEF for resp. (Per Judge)		P 09/14/2012	
 0137	01/24/2013	MOT	MOTION by Bryon Christensen to withdraw appearance of counsel.	GR 01/28/2013	B 01/25/2013 B 01/28/2013	
 0138	01/24/2013	MOT	MOTION by John Marston to withdraw appearance of counsel.	GR 01/28/2013	B 01/25/2013 B 01/28/2013	

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 0139	01/24/2013	MOT	MOTION by Manoj Viswanathan to withdraw appearance of counsel.	GR 01/28/2013	B 01/25/2013 B 01/28/2013	
 0140	01/24/2013	MOT	MOTION by Ilana Yergin to withdraw appearance of counsel.	GR 01/28/2013	B 01/25/2013 B 01/28/2013	
 0141	01/28/2013	MOT	MOTION by Daniel Davis to withdraw appearance of counsel.	GR 01/30/2013	B 01/30/2013	
 0142	02/11/2013	TCOP	T.C. OPINION, Judge Kroupa 140 T.C. No. 2 (Decision will be entered for resp.)		B 02/11/2013	
 0143	03/05/2013	DEC	DECISION ENTERED, Judge Kroupa (vacated)	ORD 03/08/2013	B 03/05/2013	
 0144	03/08/2013	OVD	ORDER, that the decision entered 3/5/13 is vacated & set aside.		B 03/08/2013	
 0145	03/08/2013	O	ORDER that the decision line of the opinion is amended to read "Decision will be entered under Rule 155". (vacated)	ORD 03/14/2013	B 03/08/2013	
 0146	03/08/2013	O	ORDER that the parties by 6/14/13 submit computations pursuant to Rule 155. (vacated)	ORD 03/14/2013	B 03/08/2013	
 0147	03/12/2013	M028	MOTION FOR RECONSIDERATION OF FINDINGS OR OPINION PURSUANT TO RULE 161 by Petr. Bank of New York Mellon Corporation	DNM 02/19/2014	R 03/18/2013	
 0148	03/12/2013	MEMO	MEMORANDUM of law in support of petr. motion for reconsideration of opinion.		R 03/18/2013	
 0149	03/14/2013	O	ORDER that the order dated 3/8/13 amending the decision line of the Court's opinion is vacated & the decision line of the Court's opinion shall again read "Decision will be entered for resp." The order dated 3/8/13 directing the parties to submit computations is vacated & no computations are necessary at this time.		B 03/19/2013	
 0150	03/18/2013	O	ORDER that resp. by 4/15/13 file a response or an objection to petr's. motion for reconsideration of opinion.		B 03/19/2013	
 0151	04/15/2013	OBJ	OBJECTION by resp. to petr. motion for reconsideration of opinion.		P 04/16/2013	
 0152	04/24/2013	MOTP	MOTION by petr. for leave to file a reply (Per Judge)	GR 04/30/2013	R 04/30/2013 B 04/30/2013	
 0153	04/24/2013	MISL	Petr. reply. -- LODGED		R 04/30/2013	
 0154	04/30/2013	R	REPLY by petr. (Per Judge)		R 04/30/2013	
 0155	07/24/2013	MOT	MOTION by Shira M. Helstrom to withdraw as counsel for petr.	GR 07/26/2013	B 07/26/2013	
 0156	09/23/2013	MOP	MEMORANDUM OPINION, Judge Kroupa (SUPPLEMENTAL) T.C. Memo. 2013-225. (An Appropriate Order will be Issued Granting Petr's Motion, and Decision will be Entered Under Rule 155.)		B 09/23/2013	
 0157	12/17/2013	JMOT	JOINT MOTION to extend time to an additional 45 days from 12/23/13 to file agreed computations.	ORD 12/18/2013		
 0158	12/18/2013	O	ORDER Joint motion to extend time to file computations is granted & the due date for the parties to file their computations is extended to 2/6/14.		B 12/19/2013	
 0159	01/27/2014	COED	COMPUTATION FOR ENTRY OF DECISION by Resp. & Petr. Bank of New York Mellon Corporation (ATTACHMENTS)		P 01/27/2014	



NO.	DATE	EVENT	FILINGS AND PROCEEDINGS	ACT/STAT DTE	SERVED	M
 0160	01/29/2014	NODC	NOTICE OF DOCKET CHANGE OF COMPUTATION FOR ENTRY OF DECISION BY RESP. & PETR. BANK OF NEW YORK MELLON CORPORATION FILED 01/27/2014. NOT ALL FILERS WERE SELECTED. PETITIONER BANK OF NEW YORK MELLON CORPORATION WAS ADDED TO DOCKET ENTRY AS A FILER.		B 01/29/2014	
 0161	02/19/2014	DNM	DENIED PETR. MOTION FOR RECONSIDERATION OF FINDINGS OR OPINION PURSUANT TO RULE 161 (VACATED)	ORD 02/28/2014	B 02/20/2014	
 0162	02/20/2014	DEC	DECISION ENTERED, JUDGE KROUPA		B 02/20/2014	
 0163	02/28/2014	O	ORDER THAT THE ORDER DATED 2/19/14, DENYING PETR'S. MOTION FOR RECONSIDERATION IS VACATED & SET ASIDE. PETR'S. SAID MOTION IS GRANTED AS SET FOR THE THE COURT'S SUPPLEMENTAL OPINION FILED 9/23/13.		B 03/05/2014	
<b>APPELLATE PROCEEDINGS</b>						
 0164	03/05/2014	NOAP	NOTICE OF APPEAL BY PETR(S). TO U.S.C.A. 2ND CIR. (FEE PD.)		B 03/05/2014	
 0165	03/05/2014	NOFC	NOTICE OF FILING W/ COPY OF NOT. OF APP. SENT TO THE PARTIES.		B 03/05/2014	
 0166	04/30/2014	NXAR	NOTICE OF CROSS-APPEAL BY RESP. TO U.S.C.A. 2ND CIR. (NO FEE)		B 05/01/2014	
 0167	05/01/2014	NOFC	NOTICE OF FILING W/ COPY OF NOT. OF APP. SENT TO THE PARTIES.		B 05/01/2014	
 0168	08/27/2015	M112	MOTION TO WITHDRAW AS COUNSEL by Julia Mara Kazaks for Petr. Bank of New York Mellon Corporation (NO OBJECTION)	GRM 09/03/2015	R 08/27/2015	
 0169	08/28/2015	O	ORDER THAT CARY DOUGLAS PUGH IS WITHDRAWN AS COUNSEL OF RECORD FOR PETR. NUNC PRO TUNC AS OF 12/16/14.		B 08/31/2015	
 0170	09/03/2015	GRM	GRANTED MOTION TO WITHDRAW AS COUNSEL		B 09/03/2015	
 0171	12/04/2015	M112	MOTION TO WITHDRAW AS COUNSEL by Brendan T. O'Dell for Petr. Bank of New York Mellon Corporation (NO OBJECTION)	GRM 12/10/2015	R 12/04/2015	
 0172	12/10/2015	GRM	GRANTED MOTION TO WITHDRAW AS COUNSEL by Counsel Brendan T. O'Dell		B 12/10/2015	
 0173	03/09/2016	DA	U.S.C.A. 2ND CIR. MANDATE 3/8/2016. DECISION AFFIRMED			