

UNITED STATES TAX COURT
 WASHINGTON, DC 20217

DAVID SHAUN NEAL,)
)
 Petitioner,)
)
 v.) Docket No. 28426-15W.
)
 COMMISSIONER OF INTERNAL REVENUE,)
)
 Respondent)

ORDER

This case is scheduled for trial at the Court’s trial session in Washington, D.C., beginning October 16, 2017. Respondent filed a motion for summary judgment on July 26, 2017, which is fully briefed as of August 28, 2017. In view of a factual dispute about the contents of the administrative record (compare Doc. 41, paras. 3-4, with Doc. 42 at 2), it is

ORDERED that respondent’s motion for summary judgment shall be held in abeyance. It is further

ORDERED that this case will proceed to a hearing at the upcoming trial session on the issue of the sufficiency of the administrative record used in this case by the IRS’s Whistleblower Office. Respondent shall produce as a witness at that hearing his declarant from Doc. 41. It is further

ORDERED that, no later than October 2, 2017, respondent shall file what it contends constitutes the administrative record, appropriately certified as to its genuineness and completeness.

(Signed) David Gustafson
Judge

Dated: Washington, D.C.
 September 11, 2017

SERVED Sep 12 2017