

UNITED STATES TAX COURT
WASHINGTON, DC 20217

| | | |
|-----------------------------------|---|------------------------|
| MICHAEL EDWARD KELLY, |) | |
| |) | |
| Petitioner(s), |) | |
| |) | |
| v. |) | Docket No. 26941-17SL. |
| |) | |
| COMMISSIONER OF INTERNAL REVENUE, |) | |
| |) | |
| Respondent |) | |
| |) | |
| |) | |
| |) | |
| |) | |
| |) | |

ORDER

This case was called from the calendar for the Trial Session of the Court on September 24, 2018 at Chicago, Illinois. Both parties appeared and filed with the Court a joint Motion For Remand. After due consideration, and for cause more fully appearing in the transcript of the proceedings, it is

ORDERED that the parties’ joint Motion For Remand, filed September 24, 2018, is granted and this case is remanded to respondent’s Office of Appeals in order to conduct a supplemental hearing consistent with the aforementioned motion. It is further

ORDERED that respondent shall promptly offer petitioner a supplemental administrative hearing at respondent’s Appeals Office located closest to petitioner’s residence (or at such other place as may be mutually agreed upon) at a reasonable and mutually agreed upon date and time, but no later than November 30, 2018. It is further

ORDERED that the parties shall, on or before January 29, 2019, file separate reports with the Court regarding the then present status of this case. Respondent

SERVED Oct 01 2018

shall attach to his report a copy of any supplemental notice of determination that his Office of Appeals may have issued. It is further

ORDERED that jurisdiction is retained by the undersigned.

(Signed) Robert N. Armen
Special Trial Judge

Dated: Chicago, Illinois
September 24, 2018