

**UNITED STATES TAX COURT  
DOCKET ENTRIES**

**Docket No.** 004865-19W

**INDEX**

Lawrence W. Doyle & John F. Moynihan

v. COMMISSIONER OF INTERNAL REVENUE

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| NO.  | DATE       | EVENT | FILINGS AND PROCEEDINGS  | ACT/STAT DTE   | SERVED       | M |
|------|------------|-------|--|----------------|--------------|---|
| 0002 | 03/11/2019 | RQT   | REQUEST FOR PLACE OF TRIAL AT WASHINGTON, DC by Petrs. Lawrence W. Doyle, John F. Moynihan   |                | R 03/15/2019 |   |
| 0003 | 03/14/2019 | O     | ORDER PETR. LAWRENCE W. DOYLE BY 4/5/19 FILE A PROPER RATIFICATION OF PETITION. THE PETITION FILED 3/11/19 IS SEALED. (ATTACHMENT)   |                | B 03/15/2019 |   |
| 0004 | 03/19/2019 | RAT   | RATIFICATION OF PETITION by Petr. Lawrence W. Doyle  |                | R 03/20/2019 |   |
| 0005 | 05/03/2019 | A     | ANSWER by Resp. (C/S 05/03/19)   |                | P 05/03/2019 |   |
| 0006 | 08/28/2019 | NTD   | NOTICE OF TRIAL ON 1/13/2020 AT WASHINGTON, DC.  |                | B 08/28/2019 |   |
| 0007 | 08/28/2019 | SPTO  | STANDING PRE-TRIAL ORDER ATTACHED TO NOTICE OF TRIAL   |                | B 08/28/2019 |   |
| 0008 | 10/18/2019 | EA    | ENTRY OF APPEARANCE by Counsel Brian R. Della Rocca for Petrs. Lawrence W. Doyle, John F. Moynihan   |                | B 10/18/2019 |   |
| 0009 | 10/29/2019 | M112  | MOTION TO WITHDRAW AS COUNSEL by Brian R. Della Rocca for Petrs. Lawrence W. Doyle & John F. Moynihan  | GRM 11/01/2019 | R 10/29/2019 |   |
| 0010 | 10/30/2019 | O     | ORDER THAT PETITIONER'S COUNSEL BY NOVEMBER 8, 2019 FILE A SUPPLEMENT TO MOTION TO WITHDRAW. PARTIES SHALL TAKE NOTE TO COURT'S PRIOR STANDING PRETRIAL ORDER ISSUED AUGUST 28, 2019. ADDITION TO REGULAR SERVICE A COPY OF THIS ORDER SHALL BE SERVED ON PETITIONERS AT THE ADDRESS STATED IN THE PETITION. |                | B 10/31/2019 |   |

| NO.  | DATE       | EVENT | FILINGS AND PROCEEDINGS   | ACT/STAT DTE   | SERVED       | M |
|--|------------|-------|---|----------------|--------------|---|
|  0011   | 11/01/2019 | SUPM  | FIRST SUPPLEMENT TO MOTION TO WITHDRAW AS COUNSEL by Counsel Brian R. Della Rocca (C/S 11/01/19)  | ORD 11/01/2019 | B 11/01/2019 |   |
|  0012   | 11/01/2019 | GRM   | GRANTED MOTION TO WITHDRAW AS COUNSEL by Counsel Brian R. Della Rocca (AS SUPPLEMENTED)   |                | B 11/05/2019 |   |
|  0013   | 11/04/2019 | M026  | MOTION FOR PROTECTIVE ORDER PURSUANT TO RULE 103 by Resp. & Petrs. Lawrence W. Doyle & John F. Moynihan (EXHIBIT) (NO OBJECTION)  | ORD 11/04/2019 | C 11/04/2019 |   |
|  0014   | 11/04/2019 | O     | ORDER THAT JOINT MOTION FOR PROTECTIVE ORDER IS GRANTED.  |                | B 11/06/2019 |   |
|  0015   | 11/14/2019 | M034  | MOTION FOR SUMMARY JUDGMENT by Resp. (C/S 11/14/19) (OBJECTION)   |                | P 11/14/2019 |   |
|  0016   | 11/14/2019 | DCL   | DECLARATION OF DEBRA MCCULLUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT by Resp. (C/S 11/14/19)   |                | P 11/14/2019 |   |
|  0017   | 11/15/2019 | O     | ORDER THAT PETITIONERS BY DECEMBER 6, 2019 FILE A RESPONSE TO MOTION FOR SUMMARY JUDGMENT. RESPONDENT BY DECEMBER 13, 2019 FILE A REPLY TO RESPONSE TO MOTION FOR SUMMARY JUDGMENT.   |                | B 11/15/2019 |   |
|  0018   | 11/15/2019 | M115  | MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF DEBRA MCCULLUM by Resp. (C/S 11/14/19)   | ORD 11/19/2019 | C 11/19/2019 |   |
|  0020   | 11/19/2019 | O     | ORDER RESPONDENT'S MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF DEBRA MCCULLUM IS GRANTED AND THAT EXHIBITS A THROUGH M TO THE DECLARATION OF DEBRA MCCULLUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT IS PLACED UNDER SEAL. THE CLERK SHALL REMOVE THE EXHIBITS FROM THE COURT'S PUBLIC RECORD AND SHALL BE RETAINED IN A SEALED FILE.   |                | B 11/20/2019 |   |
|  0021 | 12/04/2019 | RSP   | RESPONSE TO MOTION FOR SUMMARY JUDGMENT by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 12/04/19)   |                | R 12/04/2019 |   |
|  0023 | 12/04/2019 | M127  | MOTION TO SEAL DOCUMENTS by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 12/04/19)  | ORD 12/26/2019 | R 12/04/2019 |   |
|  0025 | 12/05/2019 | NTDT  | NOTICE REMINDING THE PARTIES OF TRIAL ON 1/13/2020 AT WASHINGTON, DC.   |                | B 12/05/2019 |   |
|  0026 | 12/09/2019 | NODC  | NOTICE OF DOCKET CHANGE OF MOTION FOR LEAVE TO FILE MOTION TO LEAVE TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF PETITIONERS IN CONJUNCTION WITH PETITIONERS' RESPONSE IN OPPOSITION TO RESPONDENT'S MOTION FOR SUMMARY JUDGMENT BY PETRS. LAWRENCE W. DOYLE & JOHN F. MOYNIHAN FILED 12/04/2019. THE DOCKET ENTRY TEXT WAS CHANGED OR CORRECTED TO PETITIONERS' MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF PETITIONERS IN CONJUNCTION WITH PETITIONERS' RESPONSE IN OPPOSITION TO RESPONDENT'S MOTION FOR SUMMARY JUDGMENT. |                | B 12/09/2019 |   |

| NO.  | DATE       | EVENT | FILINGS AND PROCEEDINGS  | ACT/STAT DTE   | SERVED       | M |
|--|------------|-------|--|----------------|--------------|---|
|  0027   | 12/12/2019 | REPL  | REPLY TO RESPONSE TO ORDER DATED 11/15/2019 by Resp. (C/S 12/12/19)  |                | P 12/12/2019 |   |
|  0028   | 12/12/2019 | MISC  | CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS RECORDS PURSUANT TO FEDERAL RULES OF EVIDENCE 902(11) by Resp. (C/S 12/12/19)   |                | P 12/12/2019 |   |
|  0029   | 12/13/2019 | NODC  | NOTICE OF DOCKET CHANGE OF CERTIFICATE AS TO THE GENUINNESS OF THE ADMINISTRATIVE RECORD BY RESP. FILED 12/12/2019. THE DOCKET ENTRY TEXT WAS CHANGED.   |                | B 12/13/2019 |   |
|  0030   | 12/13/2019 | M115  | MOTION FOR LEAVE TO FILE UNDER SEAL THE ADMINISTRATIVE RECORD AND INDEX TO ADMINISTRATIVE RECORD by Resp. (C/S 12/12/19) (EXHIBITS) (EXHIBITS ON DISK)   | ORD 01/09/2020 | C 12/13/2019 |   |
|  0043   | 12/13/2019 | OJR   | ORDER THAT JURISDICTION IS RETAINED BY JUDGE GUSTAFSON CASE IS CONTINUED. PETITIONERS BY JANUARY 6, 2020 FILE A REPLY TO RESPONDENT'S REPLY TO ORDER DATED 11/15/19.   |                | B 12/16/2019 |   |
|  0044   | 12/16/2019 | M105  | MOTION TO STRIKE RE: THE UNSWORN DECLARATION UNDER PENALTY OF PERJURY OF DEBRA MCCULLUM by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 12/16/19)  | ORD 06/16/2020 | R 12/16/2019 |   |
|  0045   | 12/20/2019 | O     | ORDER RESP. BY 1-6-20 SHALL FILE A RESPONSE TO PETR'S. MOTION TO STRIKE FILED 12-16-19.  |                | B 12/20/2019 |   |
|  0046   | 12/26/2019 | O     | ORDER THAT PETITIONERS' RESPONSE FILED 12/4/19 (DOC. 21) SHALL BE RETITLED AS PETITIONERS' RESPONSE TO MOTION FOR SUMMARY JUDGMENT. PETITIONERS' MOTION FOR LEAVE (DOC. 23) SHALL BE RETITLED AS PETITIONERS' MOTION TO SEAL DOCUMENTS AND THAT SAID MOTION IS GRANTED IN THAT PETITIONERS' DECLARATION WITH ACCOMPANYING EXHIBITS (DOC. 22) IS PLACED UNDER SEAL AND THE CLERK SHALL REMOVE THIS DECLARATION FROM THE COURT'S PUBLIC RECORD AND SHALL BE RETAINED IN A SEALED FILE. PETITIONERS' DECISION WITH ACCOMPANYING EXHIBITS FILED 12/4/19 (DOC. 24) IS HEREBY STRICKEN FROM THE COURT'S RECORD AND SHALL NOT BE VIEWABLE AS PART OF THIS CASE. |                | B 12/30/2019 |   |
|  0047 | 01/03/2020 | RSP   | RESPONSE TO MOTION TO STRIKE RE: THE UNSWORN DECLARATION UNDER PENALTY OF PERJURY OF DEBRA MCCULLUM by Resp. (C/S 01/03/20)  |                | P 01/03/2020 |   |
|  0048 | 01/04/2020 | RSP   | RESPONSE TO REPLY TO RESPONSE TO ORDER DATED 11/15/2019 by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 01/04/20)  |                | R 01/04/2020 |   |
|  0050 | 01/04/2020 | M115  | MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF PETITIONERS by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 01/04/20) (NO OBJECTION)  | ORD 01/09/2020 | R 01/04/2020 |   |

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|--|------------|-------|--|----------------|--------------|---|
|  0051   | 01/06/2020 | NODC  | NOTICE OF DOCKET CHANGE OF MOTION FOR LEAVE TO FILE DECLARATION OF LAWRENCE DOYLE AND JOHN MOYNIHAN RESPONSE IN REPLY TO RESPONDENT'S REPLY BY PETRS. LAWRENCE W. DOYLE & JOHN F. MOYNIHAN FILED 01/04/2020. THE DOCKET ENTRY TEXT WAS CORRECTED TO READ PETITIONERS MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF PETITIONERS.   |                | B 01/06/2020 |   |
|  0052   | 01/09/2020 | O     | ORDER THAT RESPONDENT'S MOTION FOR LEAVE TO FILE UNDER SEAL FILED DECEMBER 13, 2019 AND PETITIONER'S MOTION FOR LEAVE TO FILE UNDER SEAL FILED JANUARY 4, 2020 ARE GRANTED AND THE FOLLOWING DOCUMENTS ARE SEALED: 1.) RESPONDENT'S ADMINISTRATIVE RECORD; 2.) RESPONDENT'S EXIHBITS TO ADMINISTRATIVE RECORD; 3.) PETITIONER'S DECLARATION IN SUPPORT OF REPLY TO REPSONDENT'S REPLY. THE CLERK OF THE COURT SHALL REMOVE ALL DOCUMENTS STATED HEREIN FROM THE COURT'S PUBLIC RECORD AND SHALL BE RETAINED BY THE COURT IN A SEALED FILE. |                | B 01/13/2020 |   |
|  0053   | 06/04/2020 | RFPC  | REQUEST FOR PRETRIAL CONFERENCE by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 06/04/20)  | ORD 06/16/2020 | R 06/04/2020 |   |
|  0054   | 06/16/2020 | O     | ORDER THAT PETRS. MOTION TO STRIKE IS DENIED AND THEIR REQUEST FOR A PRETRIAL CONFERENCE IS DENIED WITHOUT PREJUDICE.  |                | B 06/16/2020 |   |
|  0055 | 07/10/2020 | LTR   | LETTER DATED MAY 26, 2020 by Petrs. Lawrence W. Doyle & John F. Moynihan (STRICKEN)  |                | R 08/05/2020 |   |
|  0056 | 07/11/2020 | RFPC  | REQUEST FOR PRETRIAL CONFERENCE by Petrs. Lawrence W. Doyle & John F. Moynihan (C/S 07/11/20)  | ORD 08/06/2020 | R 07/11/2020 |   |
|  0057 | 07/31/2020 | EA    | ENTRY OF APPEARANCE by Counsel Brian R. Della Rocca for Petrs. Lawrence W. Doyle & John F. Moynihan  |                | B 07/31/2020 |   |
|  0058 | 08/06/2020 | O     | ORDER THAT DOC. 55 IS STRICKEN FROM THE RECORD. PETITIONERS' REQUEST FOR PRETRIAL CONFERENCE IS DENIED.  |                | B 08/06/2020 |   |
|  0060 | 09/17/2020 | O     | ORDER THAT PETITIONER'S APPLICATION TO TAKE DEPOSITION OF JIMMY CORLEY IS PLACED UNDER SEAL UNTIL FURTHER DIRECTION AND THE CLERK OF THE COURT SHALL REMOVE DOC. 59 FROM THE PUBLIC RECORD. RESPONDENT BY OCTOBER 15, 2020 FILE A RESPONSE.  |                | B 09/17/2020 |   |
|  0061 | 10/08/2020 | MOP   | MEMORANDUM OPINION, JUDGE GUSTAFSON MEMO 2020-139 (AN APPROPRIATE ORDE WIL BE ISSUED.)   |                | B 10/08/2020 |   |