

**Trial Calendar:** New York, NY – Remote Proceedings  
**Date:** September 28, 2020

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**Pretrial Memorandum for [Petitioner/Respondent]**

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*Please type or print legibly. This form may be expanded as necessary.*

**NAME OF CASE:**

**DOCKET NO(S):**

Filed Electronically

**ATTORNEYS:**

Petitioner:

Respondent:

Tel:

Tel:

Email:

Email:

**AMOUNTS IN DISPUTE:**

Year(s)/Period(s)

Deficiencies/Liabilities

Additions/Penalties

**STATUS OF CASE:**

Probable Trial \_\_\_\_\_ Definite Trial \_\_\_\_\_

**CURRENT ESTIMATE OF TRIAL TIME:** \_\_\_\_\_ hour(s)

**MOTIONS YOU EXPECT TO MAKE:** *(title and brief description)*

**STATUS OF STIPULATION OF FACTS:**

Completed, will be filed electronically     In progress

**ISSUES:**

**WITNESS(ES) YOU EXPECT TO CALL:**

*(name and brief summary of expected testimony)*

**SUMMARY OF FACTS:** *(attach separate pages, if necessary, to inform the Court of facts in chronological narrative form)*

**BRIEF SYNOPSIS OF LEGAL AUTHORITIES:** *(attach separate pages, if necessary, to fully discuss your legal position)*

**EVIDENTIARY PROBLEMS:**

\_\_\_\_\_  
Date

\_\_\_\_\_  
Petitioner/Respondent

**Trial Judge:**

**[Judge]**

**United States Tax Court**

**400 Second St NW**

**Washington, DC 20217**

**[Chambers Phone No.]**