



remand. Nothing reported in this Status Report shall be deemed an admission of any kind or waiver of any appeal right.

Dated: April 24, 2023

Respectfully submitted,

/s/ William H. Narwold  
MOTLEY RICE LLC  
William H. Narwold  
bnarwold@motleyrice.com  
D.C. Bar No. 502352  
One Corporate Center  
20 Church Street, 17th Floor  
Hartford, CT 06103  
Telephone: (860) 882-1676  
Facsimile: (860) 882-1682

MOTLEY RICE LLC  
Meghan S. B. Oliver  
moliver@motleyrice.com  
Charlotte Loper  
cloper@motleyrice.com  
Ebony Bobbitt  
ebobbitt@motleyrice.com  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29464  
Telephone: (843) 216-9000  
Facsimile: (843) 216-9450

*Counsel for Plaintiffs*

LAW OFFICE OF ALLEN BUCKLEY LLC  
Allen Buckley  
ab@allenbuckleylaw.com  
2727 Paces Ferry Road, Suite 750  
Atlanta, GA 30339  
Telephone: (678) 981-4689  
Facsimile: (855) 243-0006

/s/ Stephanie A. Sasarak  
STEPHANIE A. SASARAK  
EMILY K. MILLER  
JOSEPH E. HUNSADER  
BENTON T. MORTON  
Trial Attorneys, Tax Division  
JOSEPH A. SERGI  
Senior Litigation Counsel  
U.S. Department of Justice  
Tax Division  
Post Office Box 227  
Ben Franklin Station  
Washington, DC 20044  
Telephone: (202) 307-2250  
Facsimile: (202) 514-6866  
Joseph.A.Sergi@usdoj.gov  
Joseph.E.Hunsader@usdoj.gov  
Stephanie.A.Sasarak@usdoj.gov  
Emily.K.Miller@usdoj.gov  
Benton.T.Morton@usdoj.gov  
*Attorneys for Defendant United States of America*

GUPTA WESSLER PLLC  
Deepak Gupta, Esq.  
deepak@guptawessler.com  
Jonathan E. Taylor  
jon@guptawessler.com  
1735 20th Street, NW  
Washington, DC 20009  
Telephone: (202) 888-1741  
Facsimile: (202) 888-7792

CAPLIN & DRYSDALE, CHARTERED  
Christopher S. Rizek, Esq.  
crizek@capdale.com  
One Thomas Circle, NW, Suite 1100  
Washington, DC 20005  
Telephone: (202) 862-8852  
Facsimile: (202) 429-3301

*Additional Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 24, 2023, I electronically filed the Joint Status Report in the CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Stephanie A. Sasarak  
STEPHANIE A. SASARAK  
Trial Attorney, Tax Division  
U.S. Department of Justice