

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ADAM STEELE, BRITTANY
MONTROIS, and JOSEPH HENCHMAN,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 1:14-cv-1523-RCL

ORDER

For the reasons stated in the accompanying Memorandum Opinion, it is hereby **ORDERED** that plaintiffs' Motion to Vacate is **GRANTED IN PART** and **DENIED IN PART**; and it is further

ORDERED that the government's Motion to Strike the Buckley Report is **GRANTED**; and it is further

ORDERED that plaintiffs' Motion for Leave to File Reply Under Seal is **GRANTED**.

The Memorandum Opinion was filed under seal because it references documents the parties filed under seal. It is hereby **ORDERED** that the parties meet and confer and jointly identify which, if any, parts of the Memorandum Opinion should remain sealed within ten days.

It is further **ORDERED** that the case is **REMANDED** to the IRS to determine an appropriate refund consistent with the Memorandum Opinion, as well as the Court's Summary Judgment Opinion and Amended Remand Order.


The parties are further **ORDERED** to file within 30 days of the issuance of this Order and every 30 days thereafter a joint status report informing the Court of the status of the IRS's work

on remand until such time as that work is complete. Once such work is complete, the IRS shall file a notice in this Court of its estimated refund. But first, the parties shall meet and confer and must make a good-faith effort to narrow any areas of disagreement. No later than thirty days after the conference, the parties shall file a joint status report succinctly outlining their points of disagreement about the IRS's refund estimate. When the IRS files the notice of its revised refund estimate, it shall address plaintiffs' objections in a manner that provides the Court with a sufficient basis for finding the estimate reasonable. Once the government files this notice, plaintiffs will have thirty days to file a challenge to the IRS's refund determination. The government may file an opposition within thirty days; plaintiffs may file a reply within fourteen days thereafter.

The Court will retain jurisdiction for purposes of further proceedings to follow thereafter.

IT IS SO ORDERED.

Date: 8-9-24



Royce C. Lamberth
United States District Judge