

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CAUSE OF ACTION,)	
)	
Plaintiff,)	
)	Case No.: 1:13-cv-920-ABJ
v.)	
)	
INTERNAL REVENUE SERVICE,)	
)	
Defendant.)	
_____)	

ORDER

Upon consideration of Defendant's Motion for Summary Judgment, Plaintiff's Cross-Motion for Summary Judgment, the related legal memoranda in support and in opposition, and the entire record herein, and for the reasons set forth in the accompanying memorandum opinion, it is hereby

ORDERED that Defendant's Motion for Summary Judgment is DENIED; it is FURTHER ORDERED that Plaintiff's Cross-Motion for Summary Judgment is GRANTED; and it is

FURTHER ORDERED that JUDGMENT shall be entered for Plaintiff.

This is a final appealable Order. *See* Fed. R. App. P. 4(a).

SO ORDERED.

AMY BERMAN JACKSON
United States District Judge

DATE: