

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.)	
_____)	

PLAINTIFF’S CROSS-MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Cause of Action hereby moves for summary judgment on the ground that there is no genuine issue of disputed material fact and that Plaintiff is entitled to judgment as a matter of law.

In support of this cross-motion and in opposition to Defendant Internal Revenue Service’s motion for summary judgment, Plaintiff submits the accompanying Memorandum of Points and Authorities in Support of Its Opposition to Defendant’s Motion for Summary Judgment and In Support of Plaintiff’s Cross-Motion for Summary Judgment; Plaintiff’s Statement of Undisputed Material Facts; Plaintiff’s Response to Internal Revenue Service’s Statement of Undisputed Material Facts; Declaration of Allan Blutstein; and a proposed order.

Dated: June 9, 2014

Respectfully submitted,

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