

The Honorable Thomas S. Zilly

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GLEN A. STOLL; STOLL FAMILY TRUST; )  
DIRECTOR OF THE FAMILY DEFENSE )  
LEAGUE a.k.a. FAMILY DEFENSE )  
LEAGUE a.k.a. FAMILY DEFENSE )  
NETWORK a.k.a. FAMILY DEFENSE )  
FUND; and SNOHOMISH COUNTY, )  
 )  
Defendants. )  
\_\_\_\_\_ )

Case No. 2:22-cv-01130-TSZ  
**UNITED STATES’ MOTION FOR  
EXTENSION OF TIME ON INITIAL  
SCHEDULING DATES**  
**Note on Motions Calendar:  
November 4, 2022**

Plaintiff the United States of America (“United States”) moves the Court for a 60-day extension of time on the following Initial Scheduling Dates set by the Court on October 3, 2022: FRCP 26(f) Conference; Initial Disclosures; and Joint Status Report.

1. On August 12, 2022, the United States commenced this suit to: (i) reduce to judgment the outstanding federal tax assessments against Glen A. Stoll; (ii) find a parcel of improved property located in Snohomish County, Washington, described more completely below and referred to as the “Subject Property”, is held by a nominee and/or alter ego of Defendant Glen A. Stoll; and (iii) foreclose federal tax liens on the Subject Property, selling it and distributing the proceeds of such sale in accordance with the Court’s findings as to the validity and priority of the liens and claims of all the parties as to the Subject Property. *See* Dkt. # 1 at 1-

3, ¶ 1. The Subject Property has a street address of 7311 Grove St. SE, Marysville, WA 98270, and bears Snohomish County Assessor’s Parcel No. 007753-000-007-00. See Dkt. # 1 at 3, ¶¶

11-12. The Subject Property is legally described as:

LOT(S) 7, MUNSON CREEK ESTATES DIVISION III, ACCORDING TO THE PLAT THEREOF RECORDED IN VOLUME 49 OF PLATS, PAGE(S) 180 AND 181, RECORDS OF SNOHOMISH COUNTY, WASHINGTON

See Dkt. # 1 at 3, ¶ 13.

2. On August 17, 2022, the Court issued an Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement setting the following Initial Schedule Dates:

Deadline for FRCP 26(f) Conference:	10/3/2022
Initial Disclosures Pursuant to FRCP 26(a)(a):	10/17/2022
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	10/17/2022

Dkt. # 4.

3. On October 3, 2022, on the United States’ request, the Court extended the Initial Scheduling Dates as follows:

Deadline for FRCP 26(f) Conference:	10/31/2022
Initial Disclosures Pursuant to FRCP 26(a)(a):	11/14/2022
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	11/14/2022

4. Under Fed. R. Civ. P. 4(m), the United States has 90 days after the complaint is filed to serve the Summons and Complaint on defendants. The current deadline to serve the Summons and Complaint on defendants is November 10, 2022.

5. The United States has already served the Summons and Complaint on Snohomish County and the Stoll Family Trust on September 20, 2022 and October 16, 2022, respectively. See Dkt. ## 8, 10.

6. Snohomish County and the United States entered into a stipulation regarding

1 relative priority of liens against the Subject Property that was adopted by the Court, and  
2 Snohomish County's continued participation in this action is likely not needed for a complete  
3 adjudication of the relief sought by the United States. Dkt. ## 9, 11.

4 7. Under Fed. R. Civ. P. 12(a)(1)(A)(i), the Stoll Family Trust has 21 days from  
5 service of the Summons and Complaint to respond to the Complaint. The current deadline of  
6 November 7, 2022<sup>1</sup> has not elapsed yet.

7 8. To date, the United States has not been able to effect service on Glen A. Stoll or  
8 the Director of the Family Defense League. The United States employed a process server to  
9 locate and serve Mr. Stoll and the Director of the Family Defense League but has not yet been  
10 able to locate or serve either party after several attempts to do so, including a stakeout at the  
11 Subject Property. Attached hereto as **Exhibit A** are Declarations of Non-Service from the  
12 process server.

13 9. Additionally, undersigned counsel has been in telephone communication with Mr.  
14 Stoll since October 20, 2022 to potentially arrange a date and place for the process server to  
15 serve Mr. Stoll.

16 10. In light of the foregoing, the United States is filing concurrent with this motion a  
17 motion for extension of time of 90 days, to December 27, 2022, to serve the Summons and  
18 Complaint on Glen A. Stoll and the Director of the Family Defense League.

19 11. Here, good cause exists for a 60-day extension of time on the following Initial  
20 Scheduling Dates to allow time for all parties to be served and the opportunity to participate in  
21 this action should a response to the Complaint be filed.

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27 <sup>1</sup> The deadline is extended to the next day that is not a Saturday, Sunday, or legal holiday pursuant to Fed. R. Civ. P.  
6(a)(1)(C).

1 WHEREFORE, the United States requests that the Court extend the Initial Scheduling  
2 Dates by 60 days as follows:

3 Deadline for FRCP 26(f) Conference: 12/30/2022

4 Initial Disclosures Pursuant to FRCP 26(a)(a): 01/13/2023

5 Combined Joint Status Report and Discovery  
6 Plan as Required by FRCP 26(f) and Local Civil  
7 Rule 26(f): 01/13/2023

8 Respectfully submitted this 27th day of October, 2022.

9 DAVID A. HUBBERT  
Deputy Assistant Attorney General

10 /s/ Yen Jeannette Tran  
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