

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’ RESPONSE TO  
DEFENDANT STOLL’S “SEARCH  
FOR COUNSEL LETTER TO JUDGE  
ZILLY”**

Plaintiff the United States of America submits its Response to the “Search for Counsel Letter to Judge Zilly” filed on April 14, 2023 by Defendant Glen A. Stoll. Dkt. # 30. The Court docketed the aforementioned filing as a Motion for Extension of Time to Obtain Counsel, or in the Alternative, Dismissal of Case (hereinafter referred to as the “Motion”), and noted the Motion for April 28, 2023. The Court should deny the Motion because it contains no valid basis for an additional extension of time to obtain counsel nor for dismissal of the case.

First, the Court should deny the request for an additional extension of time to obtain counsel because the Court explicitly stated that “[n]o further extension will be granted” for Defendants Stoll, the Director of the Family Defense League, and the Stoll Family Trust to obtain counsel beyond the deadline of April 14, 2023 in its Minute Order dated February 16,

1 2023. Dkt. # 28, ¶ 3. Moreover, the Court has already provided Defendants with ample time to  
2 obtain counsel, setting first a deadline of February 1, 2023, and then providing an extension to  
3 April 14, 2023. *See* Dkt. ## 24 (Minute Order dated December 19, 2022), ¶ 3; 28.

4 Second, the Court should deny the alternative request to dismiss the case because Stoll  
5 has not set forth any basis in the instant motion to support dismissal. Stoll presents nothing more  
6 than a request for the Court to sign the “proposed Order Granting Dismissal.” Dkt. # 30 at 3.  
7 Further, the proposed order is titled “Order Granting Plaintiff’s Request for Dismissal on  
8 Summary Judgment,” but Stoll has not filed a motion for summary judgment. To the extent Stoll  
9 is requesting the Court grant dismissal based on his Motion to Dismiss, Dkt. # 18, the Court  
10 should deny the Motion to Dismiss for the reasons stated in the United States’ Response to the  
11 Motion to Dismiss, Dkt. # 22.

12 WHEREFORE, for the foregoing reasons, the Court should deny Motion for Extension of  
13 Time to Obtain Counsel, or in the Alternative, Dismissal of Case.

14 Respectfully submitted this 21st day of April 2023.

15 DAVID A. HUBBERT  
16 Deputy Assistant Attorney General

17 /s/ Yen Jeannette Tran  
18 YEN JEANNETTE TRAN  
19 DYLAN C. CERLING  
20 Trial Attorney, Tax Division  
21 U.S. Department of Justice  
22 P.O. Box 683  
23 Washington, D.C. 20044  
24 202-616-3366 (v) (Tran)  
25 202-616-3395 (v) (Cerling)  
26 202-307-0054 (f)  
27 Y.Jeannette.Tran@usdoj.gov  
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*Attorneys for the United States of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of April 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Rebecca J. Guadamud (Rebecca.Guadamud@snoco.org)  
*Attorneys for Snohomish County*

I further certify that on the same date, I caused a true and complete copy of the foregoing document to be served by first-class mail, postage prepaid, to the following at the following addresses:

Glen A Stoll  
c/o Director of the Family Defense League  
16910 – 59th Avenue NE, Ste. 210  
Arlington, WA 98223

/s/ Yen Jeannette Tran  
YEN JEANNETTE TRAN  
Trial Attorney, Tax Division  
U.S. Department of Justice