

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

**DECLARATION OF YEN
JEANNETTE TRAN IN SUPPORT OF
UNITED STATES' MOTION FOR
EXTENSION OF TIME ON INITIAL
SCHEDULING DATES**

I, Yen Jeannette Tran, pursuant to 28 U.S.C. § 1746, declare that:

1. I am a trial attorney with the United States Department of Justice, Tax Division, located in Washington, D.C. In my capacity as a trial attorney, I have been assigned to represent the United States in the above-captioned case, and am in possession of the Department of Justice files concerning this matter.

2. On May 23, 2023, I sent a letter to Glen A. Stoll advising of the United States' intention to move for entry of default if an answer to the Complaint was not filed by June 2, 2023. Attached hereto as **Exhibit 1** to this Declaration is a true and correct copy of the letter, without enclosure.

3. To date, I have not received a response to my letter dated May 23, 2023,

1 described above, from Mr. Stoll.

2 DATED this 25th day of May 2023.

3 DAVID A. HUBBERT
4 Deputy Assistant Attorney General

5 /s/ Yen Jeannette Tran

6 YEN JEANNETTE TRAN

7 DYLAN C. CERLING

8 Trial Attorney, Tax Division

9 U.S. Department of Justice

10 P.O. Box 683

11 Washington, D.C. 20044

12 202-616-3366 (v) (Tran)

13 202-616-3395 (v) (Cerling)

14 202-307-0054 (f)

15 Y.Jeannette.Tran@usdoj.gov

16 Dylan.C.Cerling@usdoj.gov

17 *Attorneys for the United States of America*