

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	Civil Action
)	No. 13-1559
v.)	
)	July 29, 2015
INTERNAL REVENUE SERVICE,)	10:55 a.m.
)	
Defendant.)	Washington, D.C.
)	
)	

**TRANSCRIPT OF STATUS CALL PROCEEDINGS
BEFORE THE HONORABLE EMMET G. SULLIVAN,
UNITED STATES DISTRICT COURT JUDGE**

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Proceedings reported by machine shorthand, transcript produced by computer-aided transcription.

MORNING SESSION, JULY 29, 2015

10:55AM

10:56AM (10:55 a.m.)

10:56AM THE COURTROOM CLERK: Your Honor, this is Civil Action
10:56AM 13-1559, Judicial Watch, Inc. versus Internal Revenue Service.
10:56AM I'm going to ask counsel to please come forward and identify
10:56AM themselves for the record.

10:56AM MS. COTCA: Good morning, Judge. Ramona Cotca for
10:56AM Judicial Watch.

10:56AM THE COURT: Good morning, counsel.

10:56AM MS. COTCA: And I'm with my colleague, Paul Orfanedes is
10:56AM my colleague at the table.

10:56AM THE COURT: Good morning. Good morning to everyone.

10:56AM MR. KLIMAS: Good morning, Your Honor. Jeff Klimas for
10:56AM the Internal Revenue Service. With me at counsel table is
10:56AM Stephanie Sasarak and Carmen Banerjee with the Department of
10:56AM Justice.

10:56AM THE COURT: All right. Good morning to everyone. I
10:56AM scheduled a status hearing to determine whether or not there are
10:56AM problems with directives I issued the last time we spoke. Are
10:56AM there?

10:56AM MR. KLIMAS: Your Honor, at the last time we spoke on July
10:56AM 1st, you indicated that the IRS needed to increase the frequency
10:57AM within which it was producing documents, and the IRS also agreed
10:57AM to submit status reports in the event that TIGTA provided new
10:57AM documents or material --

10:57AM THE COURT: Was it clear that the Court directed that
10:57AM there be production on a weekly basis?

10:57AM MR. KLIMAS: That's correct, Your Honor. And you also
10:57AM invited the IRS, if that's unworkable, to file a motion to
10:57AM reconsider that order.

10:57AM THE COURT: Right. But looking at the plaintiff's status
10:57AM report, it doesn't appear that the government's complied with
10:57AM that, though. Is there a reason for that?

10:57AM MR. KLIMAS: Correct, Your Honor. The IRS has made two
10:57AM rolling productions but if it was doing weekly productions, it
10:57AM would have made more than two productions.

10:57AM THE COURT: So why didn't the government produce on a
10:57AM weekly basis?

10:57AM MR. KLIMAS: Once I went back and spoke with the IRS, the
10:57AM IRS explained that it would be burdensome and actually slow down
10:57AM the production schedule to do weekly productions rather than
10:57AM monthly productions, so I immediately --

10:57AM THE COURT: So the order was clear, though, what I ordered
10:57AM was clear, correct --

10:57AM MR. KLIMAS: Correct, Your Honor.

10:57AM THE COURT: -- to do weekly productions?

10:57AM MR. KLIMAS: That's correct.

10:57AM THE COURT: But the government's position is that it would
10:57AM have been burdensome?

10:57AM MR. KLIMAS: Our position was that you invited the IRS to

10:58AM file a motion to reconsider if would impose a burden, and --

10:58AM THE COURT: Did you file a motion?

10:58AM MR. KLIMAS: We did not, Your Honor.

10:58AM THE COURT: Some reason why you didn't?

10:58AM MR. KLIMAS: We thought it was appropriate to wait until
10:58AM you entered the order. You indicated at the hearing that there
10:58AM was going to be an order entered and --

10:58AM THE COURT: Well, wait a minute, though. You just told me
10:58AM that my order was clear that I issued July 1 ordering weekly
10:58AM production, right?

10:58AM MR. KLIMAS: That's correct.

10:58AM THE COURT: So I need to issue another ordering saying the
10:58AM original order is a real order?

10:58AM MR. KLIMAS: No, Your Honor.

10:58AM THE COURT: Then why did you need a written order?

10:58AM MR. KLIMAS: We did not need a written order. It was our
10:58AM expectation that you were going to issue one because you said you
10:58AM would. I'm not trying to stand on semantics. I --

10:58AM THE COURT: Well, I think you are. I mean, you're telling
10:58AM me on the one hand that the oral order was clear and that the
10:58AM government knew it had an obligation to produce documents on a
10:58AM weekly basis, but then you're also telling me that you thought it
10:58AM would be followed up by a written order. For what purpose?
10:58AM Suppose I never issued a written order? Would that have made the
10:59AM oral order somehow or another unclear?

10:59AM MR. KLIMAS: No, Your Honor.

10:59AM THE COURT: So what is the reason for not complying with
10:59AM the Court's order? I mean, this is a serious matter, counsel.
10:59AM You're telling me that you, as an officer of the court, knew this
10:59AM the order was clear but, nevertheless, it was not complied with,
10:59AM and I guess I'm getting at what the reason for the noncompliance
10:59AM was.

10:59AM MR. KLIMAS: Yes, Your Honor. The IRS anticipated filing
10:59AM a motion to reconsider and initially had Ms. Cotca's consent to
10:59AM file a motion to reconsider.

10:59AM THE COURT: Right, I understand that, but the IRS didn't
10:59AM file it, so why didn't the IRS comply with the Court's order?

10:59AM MR. KLIMAS: I apologize, Your Honor. Working for the IRS
10:59AM in a number of jurisdictions in the past several years, I've
10:59AM appeared in over 30 different courts, either bankruptcy or
10:59AM district courts and a number of judges, and there are a number of
10:59AM judges who, if I had filed a motion to reconsider before an order
10:59AM was entered, I feel would have felt that was inappropriate.
10:59AM That's apparently --

10:59AM THE COURT: I'm sorry, the judges would have thought it
10:59AM was inappropriate?

10:59AM MR. KLIMAS: It was inappropriate to file a motion to
10:59AM reconsider before a motion was entered.

10:59AM THE COURT: Why?

11:00AM MR. KLIMAS: I can't speak --

11:00AM THE COURT: Wait a minute. Why would it have been
11:00AM inappropriate if you said it's clear that the Court had issued an
11:00AM oral order? And we've said that -- I've said that four times.
11:00AM If it was clear that there was an order outstanding, why would it
11:00AM have been inappropriate for the government to file a motion to
11:00AM reconsider that clear oral order? I don't get it.

11:00AM MR. KLIMAS: To clarify, it was our understanding that
11:00AM there was a directive from the Court that was going to be
11:00AM followed up with a written order. It appears --

11:00AM THE COURT: An order to be followed up by an order?

11:00AM MR. KLIMAS: It appears that the understanding was
11:00AM misplaced.

11:00AM THE COURT: So you needed two orders to have a clearly
11:00AM enforceable order? You don't need two orders to have a clearly
11:00AM enforceable order, do you?

11:00AM MR. KLIMAS: No, Your Honor.

11:00AM THE COURT: So there's no reason for not complying. This
11:00AM is ridiculous. This is absurd. I thought you were going to say
11:00AM that you didn't think the Court had issued an oral order, but
11:00AM that's not what you're saying. It's clear from the transcript
11:00AM that the Court had clearly ordered rolling production on a weekly
11:00AM basis. So why shouldn't the Court hold the Commissioner of the
11:01AM IRS in contempt for not having complied with a clearly
11:01AM enforceable order?

11:01AM MR. KLIMAS: The Internal Revenue Service was trying to

11:01AM comply with the directive from the Court. It appears that we had
11:01AM not done so, but that was not intentional. It was -- the intent
11:01AM of what the IRS was doing was to respect the Court and the
11:01AM statement from the Court that there was going to be a written
11:01AM order to follow. Obviously that was misplaced, but it was not --
11:01AM there was no intent to violate the court order or to do something
11:01AM that was unthwart. The IRS was intending to comply with what
11:01AM Your Honor said from the bench on July 1st.

11:01AM THE COURT: By doing what?

11:01AM MR. KLIMAS: By filing a motion to reconsider once the
11:01AM written order was entered.

11:01AM THE COURT: That just doesn't make any sense at all. I
11:01AM mean, think about the public listening to this. The government
11:01AM says it's clear that you issued an oral order. We understand
11:01AM that you issued an oral order, Judge, to produce documents on a
11:01AM weekly basis. Nevertheless, it was burdensome for the government
11:02AM to comply with that order, and we weren't going to file a written
11:02AM motion for reconsideration for that clearly enforceable oral
11:02AM order until you issued a written order. That just doesn't make
11:02AM any sense, unless I'm missing something. But that's your
11:02AM position?

11:02AM MR. KLIMAS: That is our position. If it doesn't make
11:02AM sense, I apologize. That was the reasoning --

11:02AM THE COURT: I'm sorry?

11:02AM MR. KLIMAS: That was the reasoning. If that reasoning

11:02AM was misplaced, I apologize; it was my reasoning.

11:02AM THE COURT: Excuse me one second.

11:02AM (Brief pause in proceedings.)

11:02AM THE COURT: All right. Let me hear from plaintiff's
11:02AM counsel. Thank you.

11:02AM MS. COTCA: Thank you, Your Honor. Certainly the
11:03AM plaintiff -- we took the position that there was definitely an
11:03AM oral order from the bench that was made that day on July 1st for
11:03AM rolling production.

11:03AM In addition to that, I had asked the Court if it would
11:03AM also include status reports with the rolling orders.

11:03AM THE COURT: And I said that as well.

11:03AM MS. COTCA: And you did, you certainly did. In fact, you
11:03AM heard from me and then you asked the defendant to state their
11:03AM position. The defendant did not oppose it. They said they would
11:03AM certainly be willing to do that, and Your Honor ordered and said
11:03AM that that would also be included in a written order. Obviously,
11:03AM there's a written order -- that's just to confirm what -- Our
11:03AM position is that that's just to confirm what you said from the
11:03AM bench on July 1st, and --

11:03AM THE COURT: What are you asking me to do at this point?
11:03AM My intent was to get production of these documents. I don't want
11:03AM to get off on a tangent holding people in contempt of court.
11:03AM I'll do that, but I don't like doing that. I want to do that, I
11:03AM want to get the documents where they are supposed to be, to the

11:03AM plaintiffs. They're entitled to the documents. The public has a
11:03AM right to know what these documents say.

11:03AM MS. COTCA: And that's certainly what we wanted to do, and
11:03AM that's why we did it as a notice, Your Honor. We thought it was
11:04AM prudent and appropriate to bring this to the Court's attention.
11:04AM We want rolling productions with status reports, as we said on
11:04AM July 1st.

11:04AM THE COURT: All right. And you consented to two weeks?

11:04AM MS. COTCA: We said we wouldn't oppose a two-week --

11:04AM THE COURT: -- Okay --

11:04AM MS. COTCA: -- if they wouldn't file a motion. If the
11:04AM Court is willing -- if the standing order is for weekly
11:04AM productions, and if that's what they're obligated to do, we'll
11:04AM take weekly productions, Your Honor, with status reports.

11:04AM THE COURT: It's an outstanding court order that -- and
11:04AM quite frankly, I may never issue a minute order. It's a court
11:04AM order. All right. That's all you're asking me to do, right?

11:04AM MS. COTCA: At this point, Your Honor, yes. We want --

11:04AM THE COURT: I know it may be tempting to ask for more, but
11:04AM that's all you're asking me to do.

11:04AM MS. COTCA: That's all we're asking for now. We just want
11:04AM the documents. We want the documents with status reports.

11:04AM THE COURT: All right. Counsel, you're in a difficult
11:04AM position. I'm not going to hold you in contempt. Clearly, I
11:04AM could, I could do that. And if you think I couldn't, ask the

11:04AM Stevens prosecutors. I don't want to do that. I don't like
11:05AM holding people in contempt. I expect people to comply with court
11:05AM orders, though, and you just stood before me and told me that it
11:05AM was clearly enforceable, my oral order. You didn't need a
11:05AM written order. I know you're in a difficult position, but you
11:05AM shouldn't bear the blunt. But I can tell you this, and I will
11:05AM issue -- or maybe I won't issue a written order, it's still a
11:05AM court order, that the Internal Revenue Service has to on a weekly
11:05AM basis -- and I'm not buying into any biweekly production -- on a
11:05AM weekly basis produce the documents that are the subject of the
11:05AM court's order on July 1st and a status report. That's each -- I
11:05AM think I said Monday, each and every Monday until further order of
11:05AM the Court.

11:05AM Now, I'm not going to hold anyone in contempt. I think
11:05AM the government's position is clearly indefensible. It's
11:05AM ridiculous. It's absurd. I'm not going to tolerate further
11:06AM noncompliance with the Court's orders. If there is further
11:06AM noncompliance, I will haul into court the Commissioner of the
11:06AM Internal Revenue Service to show cause why that person should not
11:06AM be personally held in contempt of court. I can't make that any
11:06AM clearer. Is there any part of what I just said unclear?

11:06AM MR. KLIMAS: No, Your Honor.

11:06AM THE COURT: All right. So everyone understands what the
11:06AM government -- the government understands what the government's
11:06AM obligations are, correct?

11:06AM MR. KLIMAS: Yes, Your Honor.

11:06AM THE COURT: I also encourage you to read this opinion, 663
11:06AM Fed 3d 1270. It's captioned *En re: Contempt Findings in United*
11:06AM *States versus Stevens*, in which the United States Court of
11:06AM Appeals for this circuit confirmed -- actually affirmed this
11:06AM Court's decision to hold Stevens' prosecutors in contempt of
11:06AM court. Read it and understand it. I have the authority to do
11:07AM this. I'm not going to do it today. I think I would be clearly
11:07AM within my legal authority to hold you and the others in the well
11:07AM of the court and the commissioner of the Internal Revenue Service
11:07AM in contempt. I'm not going to do it. But going forward, I
11:07AM expect full compliance with the Court's orders, and if the
11:07AM government believes that a basis exists for modification or
11:07AM reconsideration of a court order, then the government should file
11:07AM a motion. Now, I can tell you right now, you can file a motion
11:07AM saying you want biweekly production. I'm going to deny that.
11:07AM And the reason I'm going to deny it is because there has not been
11:07AM compliance with the Court's order July 1. So I expect weekly
11:07AM compliance. I don't think I'm being unreasonable at all. The
11:07AM plaintiffs are entitled to this information. The public has a
11:07AM right to know what this information is.

11:07AM So, I have nothing else to say other than you have a good
11:08AM day, all right. But think about these court orders. They're
11:08AM enforceable. You're in a very difficult position, but you're
11:08AM walking out of court with your colleagues. That might not always

11:08AM be the case, okay.

11:08AM MR. KLIMAS: Understood, Your Honor.

11:08AM THE COURT: All right. Anything further?

11:08AM MS. COTCA: Nothing, Your Honor. Thank you.

11:08AM THE COURT: All right.

11:08AM MR. KLIMAS: Your Honor, could I ask one question?

11:08AM THE COURT: Sure, absolutely.

11:08AM MR. KLIMAS: If the Internal Revenue Service does do this

11:08AM weekly production for a number of weeks to show that it is

11:08AM complying with the Court's order and finds that that is actually

11:08AM slowing down the production process, would it be appropriate --

11:08AM THE COURT: I'm sorry? By doing so, it's slowing down the
11:08AM production process?

11:08AM MR. KLIMAS: That's correct, Your Honor. I can explain.

11:08AM The problem is that there are certain, I guess I would call them

11:08AM fixed costs, associated with creating CDs to produce to Judicial

11:08AM Watch. It takes roughly four to five hours to produce a CD of

11:08AM documents to produce to Judicial Watch using the software and

11:08AM technology that's available. Doing that four times a month

11:09AM versus once a month results in 16 to 20 hours being spent at a

11:09AM minimum, assuming everything works perfectly, doing something

11:09AM that was only taking four to five hours previously. So, spending

11:09AM that additional time --

11:09AM THE COURT: Wait a minute. So if you're doing it on a

11:09AM monthly basis, it would take four to five hours, correct?

11:09AM MR. KLIMAS: Correct.

11:09AM THE COURT: So doing it on a weekly basis, it takes four
11:09AM to five hours per week?

11:09AM MR. KLIMAS: Correct. The time to create the CDs does not
11:09AM decrease with the number of documents.

11:09AM THE COURT: I mean, what's the work? Is somebody
11:09AM actually -- is it labor intensive human beings, or are you
11:09AM talking about pushing buttons or what?

11:09AM MR. KLIMAS: There are human beings pushing buttons and
11:09AM doing different things. I can walk you through some of the
11:09AM technical steps that are involved in that process. The IRS is
11:09AM using a program called Clearwell. It's a document review
11:09AM platform. It's also a database management platform.

11:09AM Once IRS attorneys or disclosure specialists have reviewed
11:09AM documents, determined that they're responsive to Judicial Watch's
11:09AM FOIA requests, and made any appropriate redactions, once the
11:10AM information has been redacted --

11:10AM THE COURT: You have to use a program especially for
11:10AM Judicial Watch?

11:10AM MR. KLIMAS: It's not a program that's only being used for
11:10AM Judicial Watch, it's a program that was purchased in connection
11:10AM with the congressional investigations, which are the same
11:10AM documents that are being used to release to Judicial Watch. It's
11:10AM the same review platform that's used with congressional
11:10AM investigations with the Department of Justice.

11:10AM THE COURT: Weren't you supposed to produce for me an
11:10AM "eyes only" report of the IG's -- of the IG Office.

11:10AM MR. KLIMAS: Yes, Your Honor.

11:10AM THE COURT: And that was a court order also.

11:10AM MR. KLIMAS: I did deliver that to chambers.

11:10AM THE COURT: It was delivered to chambers?

11:10AM MR. KLIMAS: On July 2nd, I hand delivered it, yes.

11:10AM THE COURT: Okay. All right. So, you know, I had clerks
11:10AM leave and come, so it may well be. I accept that representation.
11:10AM Thank you for complying with the court order. Thank you.

11:10AM MR. KLIMAS: Yes, Your Honor.

11:10AM THE COURT: I appreciate that.

11:10AM MR. KLIMAS: But yes, that's the document review platform
11:10AM that's being used.

11:10AM THE COURT: You're certain you had it delivered to my
11:11AM chambers, right?

11:11AM MR. KLIMAS: Yes, Your Honor.

11:11AM THE COURT: You didn't deliver it --

11:11AM MR. KLIMAS: I personally delivered it.

11:11AM THE COURT: All right. I accept that. I accept that
11:11AM representation, as an officer of the court. All right.

11:11AM MR. KLIMAS: Once the IRS attorneys or disclosure
11:11AM specialists mark these documents as responsive and make any
11:11AM appropriate marks for redaction, someone has to create a
11:11AM production folder to start this new Bates number sequence for the

11:11AM documents to be put into. The documents are then copied from the
11:11AM Clearwell program into this folder. The production folder is
11:11AM then what the IRS refers to as locked. It stamps control numbers
11:11AM onto these documents so we can track what they are, and it also
11:11AM locks and redactions, burns redactions into the documents so that
11:11AM you can't see behind them. That locking process standing alone
11:11AM can take half an hour to complete.

11:11AM Once the production is locked --

11:11AM THE COURT: But is that computerized, that locking
11:11AM process?

11:11AM MR. KLIMAS: There's someone who has to manually initiate
11:12AM the locking process that is computerized.

11:12AM THE COURT: All right.

11:12AM MR. KLIMAS: The production folder is then exported onto a
11:12AM Clearwell server, and then a zip file is created from the
11:12AM Clearwell server and exported to a local hard drive. This
11:12AM process of locking and exporting and transferring actually has to
11:12AM happen twice because the IRS is generating two sets of the
11:12AM documents, one with the redactions burned in; one with the
11:12AM redactions not burned in so that we can compare them side-by-side
11:12AM to look at what's being redacted and make sure it's appropriate.

11:12AM After -- at that point, the Clearwell steps are complete.
11:12AM The IRS then has to password protect the files in this zip file,
11:12AM log onto a desktop to burn the CDs, and create two sets of CDs,
11:12AM the one's with the redactions and the ones with the redactions

11:13AM marked but not actually burned into the documents. Because the
11:13AM IRS is in a position where it needs to be able to track what
11:13AM redactions are being made and why, because the IRS may at the
11:13AM conclusion of the production have to produce a Vaughn index,
11:13AM either for some portion of the documents or for all of them, the
11:13AM IRS also exports the tagged document numbers and the basis for
11:13AM withholding the information and any other associated information
11:13AM that's reported by the person who makes the redactions. That's
11:13AM put into a spreadsheet so that the IRS can trace it, and it's my
11:13AM understanding, if that's not done contemporaneously, the IRS may
11:13AM lose the ability to track what redactions were made and why and
11:13AM not be able to use that in the future.

11:13AM Now, those steps take roughly four to five hours to
11:13AM complete, and that's the same whether we're dealing with a
11:13AM hundred documents or whether we're dealing with a thousand
11:13AM documents, and that's assuming that everything runs smoothly. It
11:13AM is possible that, for example, there could be a problem with
11:14AM Clearwell, in which case it has to be shut down and manually
11:14AM rebooted, a process that takes roughly 45 minutes on average.
11:14AM Sometimes loading documents to Clearwell can cause problems with
11:14AM Clearwell and cause it to shut down, or sometimes Clearwell just
11:14AM doesn't work for other reasons. I'm told sometimes Clearwell is
11:14AM out of commission for one or two days at a time for which
11:14AM documents cannot be reviewed or produced at all. Sometimes the
11:14AM IRS cannot use Clearwell to burn a CD for Judicial Watch because

11:14AM it's busy burning a CD for congressional committees or for other
11:14AM FOIA requestors, public and national committees, Cause of Action
11:14AM Institute, Tea Party Patriots, and it only has a capacity to burn
11:14AM CDs one type at a time, so it gets queued up. So the concern is
11:14AM that if Clearwell is down for one or two days in the course of a
11:14AM week, there would be no time for the IRS to recover, and it's
11:14AM also spending 16 to 20 hours minimum producing these CDs per
11:15AM month rather than 4 to 5 hours. So even if the IRS commits to
11:15AM producing the same volume of documents on a monthly basis, it's
11:15AM going to require more resources than it would to produce that
11:15AM same number of documents if it was doing it on a monthly basis.

11:15AM THE COURT: So why can't you get the resources? How many
11:15AM employees are there at the IRS? Can't you get the resources
11:15AM internally?

11:15AM MR. KLIMAS: There are obviously approximately 90,000
11:15AM employees at the Internal Revenue Service. It's a question of
11:15AM resources. The IRS has had its budget cut by approximately
11:15AM 20 percent since 2010. The IRS has spent approximately
11:15AM \$20 million responding to the ongoing congressional
11:15AM investigations. Since fiscal year 2012 -- I don't have a current
11:15AM number, but I understand at one point the FOIA backlog had
11:15AM increased by nearly 300 percent because there was a great
11:15AM increase in the number of FOIA requests that were being received.
11:15AM So, could we put someone on to do this more frequently? Of
11:15AM course, and we obviously will, because we understand that this is

11:15AM the order and we will comply with it, but it's a question of
11:16AM whether that is the best use of the IRS's resources, given the
11:16AM fact that it has limited resources available.

11:16AM THE COURT: Okay. Well, we all have limited resources.
11:16AM That's the court order for the time being. Thank you. That's
11:16AM very interesting, but thank you. But that's going to be the
11:16AM court order. All right.

11:16AM MR. KLIMAS: Thank you, Your Honor.

11:16AM THE COURT: All right. Thank you very much. Anything
11:16AM further?

11:16AM MS. COTCA: No, Your Honor.

11:16AM THE COURT: All right. And also, I note that the Judicial
11:16AM Watch -- I'm not trying to give you any ideas, Judicial Watch did
11:16AM not ask that anyone be held in contempt, so that's fair, too.
11:16AM You just want production of the documents, and that's all I want,
11:16AM too.

11:16AM MS. COTCA: With the status reports.

11:16AM THE COURT: With the status reports, too. Weekly basis,
11:16AM every Monday.

11:16AM MR. KLIMAS: And you would like a copy of those status
11:16AM reports as well?

11:16AM THE COURT: Absolutely.

11:16AM MR. KLIMAS: Understood.

11:16AM THE COURT: All right. Anything further?

11:16AM MR. KLIMAS: No.

11:16AM THE COURT: I'm not going to schedule another hearing
11:16AM right now. Actually --

11:16AM MR. KLIMAS: We do have a hearing scheduled for October
11:16AM 7th, I believe.

11:16AM THE COURT: That's right. Thank you for reminding me.
11:16AM All right. Thank you. Have a nice day. Thank you.

11:16AM (Proceedings adjourned at 11:16 a.m.)

C E R T I F I C A T E

I, Scott L. Wallace, RDR-CRR, certify that
the foregoing is a correct transcript from the record of
proceedings in the above-entitled matter.

/s/ Scott L. Wallace

7/29/15

**Scott L. Wallace, RDR, CRR
Official Court Reporter**

Date