

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 2:19-cv-00653-RAJ-DEM
)	
v.)	
)	
FRANCHISE GROUP INTERMEDIATE)	
L 1, LLC, d/b/a LIBERTY TAX SERVICE,)	
)	
Defendant.)	
_____)	

**JOINT MOTION FOR ENTRY OF ORDER
PURSUANT TO 26 U.S.C. § 7402(a)**

The United States and Franchise Group Intermediate L 1, LLC, d/b/a Liberty Tax Service (“Liberty”), jointly move for entry of a proposed Order pursuant to 26 U.S.C. § 7402(a) (attached hereto as Exhibit 1)¹ that would settle all claims in this action. As addressed in the parties’ brief in support of this Motion: (1) the jurisdictional prerequisites to this action and for entry of the parties’ proposed Order are met; (2) the Order is in the interests of the United States, Liberty, and the public and is necessary or appropriate for the enforcement of the internal revenue laws; and (3) the Order is fair, adequate, and reasonable and is not illegal, a product of collusion, or against the public interest.

¹ The proposed Order attached as Exhibit 1 redacts portions of its terms that the parties are jointly requesting, through a separate motion, remain under seal. As addressed in their brief in support of the joint motion to seal, the parties believe that it is essential that limited portions of the order, in particular thresholds that would trigger certain compliance measures in response to tax returns prepared at Liberty Tax Service stores, must be placed under seal to ensure the Order’s effectiveness.

Pursuant to Local Civil Rule 7(J) and Federal Rule of Civil Procedure 78, the parties submit this Motion without a request for oral argument.

WHEREFORE, the United States and Liberty request that the Court enter the parties' proposed Order pursuant to 26 U.S.C. § 7402(a).

Date: December 3, 2019

Respectfully submitted,

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