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14 *Of Counsel*

15 UNITED STATES DISTRICT COURT FOR THE
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 IN THE MATTER OF THE TAX
LIABILITIES OF:
19 JOHN DOES, United States taxpayers who,
20 at any time during the years ended
December 31, 2004, through December 31,
21 2012, directly or indirectly had interests in or
signature or other authority (including
22 authority to withdraw funds, trade or give
instructions or receive account statements,
23 confirmations or other information, advice or
solicitations) with respect to any financial
24 accounts maintained at, monitored by, or
managed through CIBC FirstCaribbean
25 International Bank Limited, its predecessors,
subsidiaries, and affiliates (collectively,
26 FCIB) and financial accounts maintained at,
monitored by, or managed through other
27 financial institutions that FCIB permitted to
transact client business through its United
28 States correspondent account at Wells Fargo
Bank, N.A.

Civil Number: **CV 13 1938**
NOTICE OF FILING EX PARTE
PETITION FOR LEAVE TO SERVE
"JOHN DOE" SUMMONS

FILED
2013 APR 29 A 9:46
RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

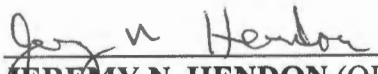
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1 The United States of America notifies the Court that it has commenced this *ex parte* proceeding
2 pursuant to Section 7609(f) of the Internal Revenue Code (26 U.S.C.), for leave to serve an Internal
3 Revenue Service "John Doe" summons upon Wells Fargo Bank, N.A. Pursuant to 26 U.S.C. § 7609(h),
4 the determination to be made by the Court "shall be made *ex parte* and shall be made solely on the
5 petition and supporting affidavits." Thus, the pleadings filed in this proceeding will not be served upon
6 any person or entity and no other filings are permitted from other persons or entities. Accordingly, this
7 matter is ripe for the Court's consideration.

8 The United States requests that the Court review the Petition and supporting documents and enter
9 the Proposed Order at the Court's earliest opportunity.

10 Respectfully submitted this 29th day of April, 2013.

11 KATHRYN KENEALLY
12 Assistant Attorney General

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