

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF THE TAX  
LIABILITIES OF:

JOHN DOES, United States taxpayers, who at any time during the years ended December 31, 2002 through December 31, 2011, directly or indirectly had interests in or signature or other authority (including authority to withdraw funds; trade or give instructions or receive account statements, confirmations, or other information, advice or solicitations) with respect to any financial accounts maintained at, monitored by, or managed through Wegelin & Co. and financial accounts maintained at, monitored by, or managed through other Swiss financial institutions that Wegelin & Co. permitted to transact client business through its United States correspondent account at UBS AG.

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Case No. 13 mc 21

~~PROPOSED~~ ORDER GRANTING  
*EX PARTE* PETITION FOR  
LEAVE TO SERVE "JOHN DOE"  
SUMMONS

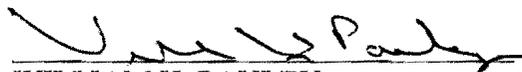
ECF Case

THIS MATTER is before the Court upon the United States of America's "*Ex Parte* Petition for Leave to Serve "John Doe" Summons (the "Petition"). Based upon a review of the Petition and supporting documents, the Court has determined that the "John Doe" summons to UBS AG relates to the investigation of an ascertainable group or class of persons, that there is a reasonable basis for believing that such group or class of persons has failed or may have failed to comply with any provision of any internal revenue law, and that the information sought to be obtained from the examination of the records or testimony (and the identities of the persons with respect to whose liability the summons is issued) are not readily available from other sources. It is therefore:

ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent Cheryl Kiger or any other authorized officer or agent, may serve an Internal Revenue Service "John Doe" summons upon UBS AG in substantially the form as attached as Exhibit E to

the Declaration of Cheryl Kiger. A copy of this Order shall be served together with the summons.

SO ORDERED this 25<sup>th</sup> day of January, 2013.

  
WILLIAM H. PAULEY  
UNITED STATES DISTRICT JUDGE  
*Part I Judge*

Copy to:

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U.S. Attorney's Office  
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