

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE TAX	)	
LIABILITIES OF:	)	Civil Action No. _____
	)	
JOHN DOES, Norwegian taxpayers holding	)	
PNC Bank, N.A.	)	
payment card XXXXXXXXXXXXX2075 and	)	
RBS Citizens, N.A.	)	
payment card XXXXXXXXXXXXX5082.	)	

**NOTICE OF FILING *EX PARTE* PETITION  
FOR LEAVE TO SERVE “JOHN DOE” SUMMONSES**

The United States of America notifies the Court that it has commenced this *ex parte* proceeding pursuant to section 7609(f) of the Internal Revenue Code (26 U.S.C.) for leave to serve Internal Revenue Service “John Doe” summons upon PNC Bank, N.A. and RBS Citizens, N.A. The Court’s determination “shall be made *ex parte* and shall be made solely on the petition and supporting affidavits.” 26 U.S.C. § 7609(h). Thus, the pleadings filed in this proceeding will not be served upon any person or entity, and no other filings are permitted from other persons or entities. This matter, therefore, is ripe for the Court’s consideration. The United States requests that the Court review the Petition and supporting documents and enter the proposed Order at the Court’s earliest opportunity.

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DATE: July 22, 2013

KATHRYN KENEALLY  
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U.S. Department of Justice

/s/ Yonatan Gelblum  
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