

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN THE MATTER OF THE TAX )  
LIABILITIES OF: ) Civil Action No. 5:13-00657  
)  
JOHN DOE, Norwegian taxpayer holding )  
USAA Federal Savings Bank )  
payment card XXXXXXXXXXXXXXX3372. )

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

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 an Internal Revenue Service “John Doe” summons upon USAA Federal Savings Bank. 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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