IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Adam Steele, Brittany Montrois, and	
Joseph Henchman, on behalf of)
themselves and all others similarly)
situated,)
Plaintiffs,)
v.) Civil Action No.: 1:14-cv-01523-RCL
United States of America,)
Defendant.	<i>)</i> _)

JOINT STATUS REPORT

On January 24, 2023, this Court remanded this matter to the IRS to determine an appropriate refund for the class. (ECF 222 ("Order")). The Order also required the parties to file a joint status report every 30 days informing the Court of the "IRS's work on remand until such time as that work is complete." *Id.* The parties submit this joint status report as required by the Order.

<u>United States:</u> The United States reports as follows: During the past 30 days, counsel for the United States and the IRS have held several additional meetings to resolve the few outstanding issues to calculate the appropriate refund for the vendor portion of the PTIN user fee. A package containing the vendor portion refund recommendation has been submitted to the appropriate IRS officials for approval. In prior status reports, the IRS reported that it had approved the IRS portion of the PTIN user fee. Nothing reported in this Status Report shall be deemed an admission of any kind or waiver of any appeal right.

Position of Plaintiffs' Co-Counsel Allen Buckley. Regarding the above from Defendant and what has been done with respect to this matter to date: Res ipsa loquitur. Counsel for Plaintiffs have an ethical obligation to serve their clients, the vast majority of whom are U.S. citizens and taxpayers. Delaying the refunds due these individuals is harmful to them.

(Signature blocks on the following pages.)

Dated: November 22, 2023

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 $Additional\ Counsel\ for\ Plaintiffs$

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, I electronically filed the Joint Status Report in the CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Benton T. Morton

BENTON T. MORTON
Trial Attorney, Tax Division
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