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.

United States of America,

Defendant.

Case No. 14-cv-01523-RCL

MOTION FOR A PLEMINARY INJUNCTION

For the reasons set forth in the memorandum submitted with this motion, Plaintiffs motion

the Court to order the Defendant to require the Internal Revenue Service and U.S. Treasury

Department to cease requiring class members, each of whom has a Preparer Tax Identification

Number (PTIN), to file a Form W-12 (manually or online) or any other form or submission at any

time hereafter to "renew" their PTINs.

The undersigned tried hard to get co-counsel to file this motion and related documents. It

would not do so. (I was told by Bill Narwold of Motley Rice LLC I should not to include Motley

Rice LLC, Gupta Wessler PLLC or Chris Rizek on the submission.) The undersigned firmly

believes making this filing is in the best interest of the class because return preparers do not wish to

annually file anything with the IRS to maintain a permanent identification number (a PTIN) and

the 2019 ruling of the D.C. Court of Appeals with respect to this case provides that return

preparers can potentially be charged for the IRS's costs of "renewals." If return preparers are not

required to renew their PTINs, they cannot be charged for such.

Because the IRS plans to begin requiring "renewals" beginning in mid—October of 2020, expedited consideration of this matter is requested so that the matter will be resolved by mid-October.

Dated: September 16, 2020   Respectfully submitted,

                                             /s/ Allen Buckley

                                             Allen Buckley LLC

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