

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. As stated in numerous past months' filings, Plaintiffs' co-counsel Allen Buckley (a CPA) has prepared a reasonable estimate of the costs of issuing and renewing PTINs (and maintaining a PTINs database) in a manner believed (by Allen Buckley) to be in accordance with the costs terms of the Court's order dated January 24, 2023, for IRS fiscal years ended in 2011 through 2017. Defendant has informed Plaintiffs the IRS is working to have a "final number by the next report if no new issues arise (and if there is no lapse in appropriations)." Plaintiffs do not see how any new issues could arise. Plaintiffs will take Defendant at its word.

(Signature blocks on the following pages.)

Dated: October 23, 2023

Respectfully submitted,

/s/ William H. Narwold
MOTLEY RICE LLC
William H. Narwold
bnarwold@motleyrice.com
D.C. Bar No. 502352
One Corporate Center
20 Church Street, 17th Floor
Hartford, CT 06103
Telephone: (860) 882-1676
Facsimile: (860) 882-1682

MOTLEY RICE LLC
Meghan S. B. Oliver
moliver@motleyrice.com
Charlotte Loper
cloper@motleyrice.com
Ebony Bobbitt
ebobbitt@motleyrice.com
28 Bridgeside Boulevard
Mount Pleasant, SC 29464
Telephone: (843) 216-9000
Facsimile: (843) 216-9450

Counsel for Plaintiffs

LAW OFFICE OF ALLEN BUCKLEY LLC
Allen Buckley
ab@allenbuckleylaw.com
2727 Paces Ferry Road, Suite 750
Atlanta, GA 30339
Telephone: (678) 981-4689
Facsimile: (855) 243-0006

GUPTA WESSLER PLLC
Deepak Gupta, Esq.
deepak@guptawessler.com
Jonathan E. Taylor
jon@guptawessler.com
1735 20th Street, NW
Washington, DC 20009
Telephone: (202) 888-1741

/s/ Emily K. Miller
EMILY K. MILLER
STEPHANIE A. SASARAK
BENTON T. MORTON
JOSEPH E. HUNSADER
Trial Attorneys, Tax Division
JOSEPH A. SERGI
Senior Litigation Counsel
U.S. Department of Justice, Tax Division
Post Office Box 227, Ben Franklin Station
Washington, DC 20044
Telephone: (202) 307-2250
Facsimile: (202) 514-6866
Joseph.A.Sergi@usdoj.gov
Joseph.E.Hunsader@usdoj.gov
Stephanie.A.Sasarak@usdoj.gov
Emily.K.Miller@usdoj.gov
Benton.T.Morton@usdoj.gov
*Attorneys for Defendant United States of
America*

Facsimile: (202) 888-7792

CAPLIN & DRYSDALE, CHARTERED

Christopher S. Rizek, Esq.

crizek@capdale.com

One Thomas Circle, NW, Suite 1100

Washington, DC 20005

Telephone: (202) 862-8852

Facsimile: (202) 429-3301

Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 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/ Emily K. Miller
EMILY K. MILLER
Trial Attorney, Tax Division
U.S. Department of Justice