

**UNITED STATES TAX COURT**  
**WASHINGTON, DC 20217**

ESTATE OF RICHARD MCWILLIAM,	)	
DECEASED, VIVIANNE B. MCWILLIAM,	)	
SPECIAL ADMINISTRATOR,	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 21101-12
	)	
COMMISSIONER OF INTERNAL REVENUE,	)	
	)	
Respondent.	)	

**ORDER**

This case is calendared for trial on the November 18, 2013, San Francisco, California trial session and is related to the cases at Docket Nos. 15049-12, 19980-12 and 24218-12 that are also calendared on the November 18, 2013, San Francisco, California trial session.

Petitioner filed a Motion to Continue on July 9, 2013, asking the Court to restore this case to the general docket to be assigned to a Special Trial Session. Petitioner's counsel states that Richard McWilliam, Deceased was intimately involved in the audits and was the individual most familiar with all of the factual and legal issues. Petitioner's counsel reports that Vivianne B. McWilliam was totally unaware of the audits that involve tax years 2000 through 2004 and combined deficiencies exceeding \$160 million. Petitioner's counsel states that respondent's counsel does not object to this case being continued.

The Court understands that there are voluminous, unorganized documents and perhaps thousands of pages of undiscovered documents. The Court wants these cases to be resolved or, at least, to have the issues for trial narrowed. The Court therefore wants the parties to account to the Court on the status of this case and the related cases. Continuing this case and the related cases generally would subvert the Court's goal of resolving tax cases in an efficient and effective matter.

**SERVED Jul 11 2013**

McWilliam Estate v. Commissioner  
Docket No. 21101-12

Upon due consideration and for cause, it is

ORDERED that jurisdiction of this case is retained by Judge Diane L. Kroupa. It is further

ORDERED that petitioner's Motion to Continue, filed July 9, 2013, is granted in that this case is continued until further direction by Judge Diane L. Kroupa. It is further

ORDERED that the parties shall, on or before January 31, 2014, file a joint report stating the then present status of this case and the related cases. The status report shall detail the times and dates the parties have met or otherwise communicated to try and narrow the issues for trial or resolve this case without the need for a trial. The Court urges the parties to cooperate with each other to resolve this case.

**(Signed) Diane L. Kroupa**  
**Judge**

Dated: Washington, D.C.  
July 10, 2013