

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

TRUE THE VOTE, INC.,  
Plaintiff,

v.

INTERNAL REVENUE SERVICE, *et al.*,  
Defendants.

Civil Action No. 13-cv-00734-RBW

**TRUE THE VOTE’S CLARIFICATION OF ITS RESPONSE TO  
THE INDIVIDUAL IRS DEFENDANTS’  
MOTION FOR AN EXTENSION OF TIME TO OCTOBER 18, 2013**

Plaintiff, True the Vote, Inc. (“True the Vote”), by counsel, respectfully clarifies, at the request of counsel to Defendants Steven T. Miller, Douglas Shulman, William Wilkins, Lois Lerner, Holly Paz, Cindy M. Thomas, Steven Grodnitzky, Michael C. Seto, Susan Maloney, Ronald Bell, Janine L. Estes, and Faye Ng (collectively, the “Individual IRS Defendants”) the response of True the Vote filed on September 24, 2013 (Dkt. #56) with regard to the Individual IRS Defendants’ Motion for Extension of Time to Answer the First Amended Complaint (Dkt. #48).

The Individual IRS Defendants’ cited in their Motion for an Extension that counsel to plaintiffs in another case against the IRS, *Linchpins of Liberty*, had agreed to the Individual IRS Defendants’ request for an extension to October 18, 2013 to file responsive pleadings. In its Response, True the Vote pointed out that such an agreement in another case should have no bearing on this litigation and that the agreement to extend time in that other case also included an apparent agreement for additional time sought by the Plaintiff to amend its complaint, a fact not present in this litigation. Counsel for the Individual IRS Defendants has advised True the Vote’s

counsel that the request by *Linchpins of Liberty* for an extension of time to prepare and file an amended complaint did not occur until after the order extending Individual IRS Defendants' response date had already been entered.

Per the request of Defendants' counsel, True the Vote hereby advises the Court of the correct sequence of events in which counsel in the *Linchpins of Liberty* lawsuit discussed their respective requests for extension of time.

Dated: September 27, 2013

Respectfully submitted,

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*(\*) Pro hac vice motions granted*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2013, I caused TRUE THE VOTE'S OPPOSITION TO THE INDIVIDUAL DEFENDANTS' MOTION FOR AN EXTENSION OF TIME to be filed with the United States District Court for the District of Columbia by using the Court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

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I further certify I will cause a true and correct copy of the foregoing to be served upon the following at his last known addresses via U.S. Certified Mail:

DAVID FISH  
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September 27, 2013

/s/ Cleta Mitchell  
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