

TITLE OF CASE	ATTORNEYS
<p>CHURCH OF SPIRITUAL TECHNOLOGY A California Nonprofit Corporation</p> <p>vs</p> <p>THE UNITED STATES</p> <p>88-581</p> <p>Declaratory Judgment (Tax)</p>	<p>FOR PLF: ✓ Monique E. Yingling Zuckert, Scoutt et al. 888 17th St NW Washington, DC 20036 Atty of Record</p> <p>298-8669</p> <p>Religious</p> <p>Thomas C. Spring Of Counsel</p>

<p>SERVED ON DEFENDANT.</p> <p>AMOUNT CLAIMED: Not Stated</p> <p>PLAINTIFFS ADDRESS: Suite 162 419 North Larchmont Los Angeles, CA 90004</p>	<p>FOR U.S.</p> <p>David Gustafson</p> <p>W - C - R a p p</p>

Appeals of # CAFC 92-5155
(4th floor)

DATE	PROCEEDINGS
Oct 6 1988	Filing fee of \$60 paid by plaintiff.
Oct 6 1988	One separately bound volume of exhibits to the complaint filed.
Oct 6 1988	Notice of assignment to Judge Eric G. Bruggink filed. Copy to parties.
Oct 13 1988	Defendant's notice of appearance filed. Service: 10/13/88.
Dec 5 1988	Defendant's answer filed. Service: 12/5/88.
Dec 5 1988	Defendant's motion for a scheduling order re filing of administrative record filed. Service: 12/5/88. GRANTED IN PART: SEE ORDER ENTERED MAR 10 1989.
Dec 22 1988	Plaintiff's response to motion for scheduling order re administrative record and cross-motion for scheduling order re administrative record filed. Service: 12/22/88. GRANTED IN PART: SEE ORDER ENTERED MAR 10 1989.
Dec 28 1988	Plaintiff's motion to strike affirmative allegations from defendant's answer filed. Service: 12/28/88.
Jan 9 1989	SEE ORDER OF NOVEMBER 29, 1989. Defendant's reply in support of its motion for a scheduling order re: administrative record and opposition to plaintiff's cross-motion filed. Service: 1/9/89.
Jan 10 1989	Defendant's motion for extension of time (to 30 days after date of the filing of the administrative record) to respond to plaintiff's motion to strike filed. Service: 1/10/89.
Jan 17 1989	Joint motion for enlargement of time (60 days after filing of admin. rec.) to file the joint preliminary status report filed. Service: 1/17/89. ALLOWED: JAN 18 1989.
Jan 25 1989	Plaintiff's motion for leave to file its reply in support of cross-motion for scheduling order, etc. out of time filed. Service: 1/24/89. ALLOWED: JAN 25 1989.
Jan 25 1989	Plaintiff's reply in support of its cross-motion for scheduling order re: administrative record filed.
Feb 15 1989	Order entered scheduling oral argument. Copy to parties.
Feb 27 1989	Order entered re further proceedings. Copy to parties.
Mar 10 1989	Order entered superseding the 2/27/89; granting in part parties' motions of 12/5/88 & 12/22/88 with defendant to file a certified copy of the administrative record by April 10, 1989 . Copy to parties.
Mar 31 1989	Transcript of proceedings (1 volume) taken at Washington, D.C., on February 24, 1989, filed. Notice to parties.

DATE	PROCEEDINGS	Bruggink
Apr 14 1989	Defendant's motion for leave to file motion for enlargement out of time, and motion for enlargement of time (to April 17, 1989) to file the administrative record filed. Service: 4/13/89. ALLOWED: Apr 17 1989.	
Apr 17 1989	Defendant's motion for enlargement of time (to April 19, 1989) to file the administrative record filed by leave of the Judge. Service: 4/14/89. ALLOWED: Apr 17 1989.	
Apr 19 1989	Defendant's motion for leave to file only one copy of the administrative record etc. filed. Service: 4/19/89. ALLOWED: APR 20 1989.	
Apr 20 1989	Defendant's certification of administrative record, index to administrative record, and ten boxes of documents filed.	
Apr 20 1989	Order entered directing plaintiff to file its response to the administrative record by May 10, 1989 with defendant to reply by May 25, 1989. Copy to parties.	
May 8 1989	Defendant's motion for leave to have employee insert items into the administrative record, to have employee check out originals of exhibits VTI-625, -Aa and -Ab, file one copy of Addendum to Part V3 of administrative record and give notice of corrections to its previous filings filed. Service: 5/4/89. ALLOWED: MAY 10 1989.	
May 10 1989	Defendant's addendum to part VII of the Administrative Record (contained in one box) filed.	
May 12 1989	Plaintiff's motion excepting to administrative record filed by defendant filed by leave of the Judge. Service: 5/10/89. SEE OPINION OF OCTOBER 2, 1989.	
May 25 1989	Plaintiff's motion for leave to file copies of items 586, 650, and the remainder of a copy of item of Part IV of the Admin. Record; to file corrected copies of index to Part IV and table of additional items; and to reserve right to take exception to contents of Addendum to Part VII of the Admin. Record filed by leave of the Judge. Service: 5/24/89. SEE OPINION OF OCTOBER 2, 1989.	
May 25 1989	Order entered waiving the requirement of filing of copies of the administrative record or any proposed addition. Copy to parties.	
May 26 1989	Defendant's response to plaintiff's motion excepting to administrative record filed. Service: 5/25/89.	
May 31 1989	Joint preliminary status report filed. /	
Jun 2 1989	Plaintiff's reply to response to motion excepting to administrative record etc. filed. Service: 6/2/89.	
Jun 8 1989	Order entered scheduling oral argument on motion excepting to administrative record; -s:"directing defendant \$6"file its motion to dismiss 60 days after filing of administrative record. Copy to parties.	

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DATE	PROCEEDINGS	Bruggink
Jun 21 1989	Defendant's motion for leave to oive notice of recent decision filed. Service by hand: 6/20/89^ ALLOWED: JUU 26 1989. Plaintiff may respond on or before July 7, 1989. No reply.	
Jul 5 1989	Judge's order scheduling oral argument filed. Copy to parties.	
Jul 5 1989	Plaintiff's response to defendant's motion for leave to give notice filed. Service: 7/5/89.	
Aug 22 1989	Judge's order allowing plaintiff to file an affidavit by September 1, 1989, with defendant allowed to file a responsive affidavit within 10 days of service filed. Copy to parties.	
Sep 5 1989	Plaintiff's motion for leave to file out of time the affidavit of William C. Walsh filed. Service: 9/5/89. ALLOWED: SEP 7 1989.	
Sep 7 1989	Affidavit of William C. Walsh filed.	
Sep 19 1982	Defendant's response to plaintiff's affidavit filed. Service: S/18/89.	
Sep 21 1989	Transcript of proceedings (1 volume) taken at Washington, D.C., on August 22, 1989, filed. Notice to parties.	
Sep 26 1989	Plaintiff's motion to strike response to affidavit filed. Service: 9/26/89. DENIED: SEP 27 1989.	
Oct 2 1989	Judge's opinion allowing plaintiff's motion for leave filed May 25, 1989; and granting in part and denying in part plaintiff's motion excepting to administrative record; permitting plaintiff to substitute legible copies of materials; directing defendant to file its motion to dismiss by November 15, 1989, or its motion for summary judgment by December 1, 1989; and directing defendant to respond to motion to strike affirmative allegations by October 30, 1989, filed. Copy to parties.	
Oct 30 1989	Defendant's response to motion to strike filed. Service: 10/30/89.	
Nov 13 1989	Plaintiff's reply to response to motion to strike filed. Service: 11/13/89.	
Nov 15 1989	Defendant's motion for enlargement of time (to November 22, 1989) to file its motion to dismiss filed. Service: 11/14/89. ALLOWED: NOV 16 1989.	
Nov 15 1989	Defendant's motion to enter attached order supplementing the provisions of Rule 56 filed. Service: 11/14/89. ALLOWED: SEE ORDER ENTERED: NOV 17 1989.	
Nov 17 1989	Order supplementing Rule 56(d) filed. Copy to parties. <u>NOTE:</u> Each proposed findings to be on separate page; statement of genuine issues shall be document consisting of proposed finding with response typed under it; and a reply to statement may be filed consisting of proposed finding, response, and reply thereto as indicated above. Rule 12 motions may have proposed findings.	
Nov 22 1989	Defendant's motion to dismiss filed together with a one volume appendix. Service: 11/22/89.	

DATE	PROCEEDINGS	Bruggink
Nov 22 1989	Defendant's proposed findings of uncontroverted fact filed. Service: 11/22/89.	
Nov 29 1989	Judge's order denying plaintiff's motion to strike affirmative allegations from defendant's answer filed. Copy to parties.	
Dae 19 1989	Plaintiff's motion for enlargement of time (to January 25, 1990) to respond to motion to dismiss filed. Service: 12/19/89. ALLOWED: DEC 20 1989.	
Jan 25 1990	Plaintiff's cross motion to declare the final adverse ruling null and void filed. See brief for service.	
Jan 25 1990	DENIED: SEE OPINION DATED JULY 13, 1990. Plaintiff's brief in opposition to motion to dismiss and in support of its cross motion, etc., together with two separately bound volumes of appendix filed. Service: 1/25/90.	
Jan 25 1990	Plaintiff's proposed findings of uncontroverted facts filed. See brief for service.	
Jan 25 1990	Plaintiff's response to defendant's proposed findings of uncontroverted fact filed. See brief for service.	
Feb 1 1990	Defendant's motion to suspend proceedings on plaintiff's cross-motion until after ruling on motion to dismiss filed. Service: 1/31/90. SEE ORDER OF FEBRUARY 13, 1990.	
Feb 6 1990	Defendant's motion for leave to give notice of citation forms filed. Service: 2/5/90. ALLOWED: FEB 7 1990.	
Feb 7 1990	Order entered scheduling a phone conference. Copy to parties.	
Feb 8 1990	Plaintiff's opposition to motion to suspend proceedings on plaintiff's cross-motion filed. Service: 2/8/90.	
Feb 8 1990	Defendant's motion for enlargement of time (to February 26, 1990) to file its reply brief filed. Service: 2/8/90. ALLOWED: FEB 9 1990.	
Feb 13 1990	Judge's order granting defendant's motion to suspend proceedings on plaintiff's cross-motion; directing plaintiff to file a supplemental response to defendant's proposed findings of fact by February 23, 1990, with the date for filing defendant's reply brief to run from service of the supplemental filing; directing defendant to respond to plaintiff's proposed findings as part of its reply; allowing plaintiff to reply within 1-7 days of service; and scheduling oral argument filed. Copy to parties.	
Feb 16 1990	Plaintiff's supplemental response to defendant's proposed findings of uncontroverted fact filed. Service by hand: 2/16/90.	
Mar 2 1990	Defendant's motion for enlargement of time (to March 9, 1990) to file its reply brief filed. Service: 3/2/90. ALLOWED: MAR 5 1990.	

DATE	PROCEEDINGS	Bruggink
Mar 9 1990	Defendant's motion for enlargement of time (to March 12, 1990) to file its reply brief filed. Service: 3/9/90. ALLOWED: MAR 12 1990.	
Mar 12 1990	Defendant's reply brief filed together with a one volume appendix. Service: 3/12/90..	
Mar 12 1990	Defendant's reply to responses to proposed findings of uncontroverted fact filed. Service: 3/12/90.	
Mar 12 1990	Defendant's responses to proposed findings of uncontroverted fact filed. Service: 3/12/90.	
Mar 20 1990	Defendant's motion for leave to make correction in its reply brief filed. Service: 3/19/90. ALLOWED: MAR 26 1990.	
Mar 29 1990	Plaintiff's reply to responses to proposed findings of uncontroverted fact filed together with a one volume appendix. Service: 3/29/90.	
Apr 11 1990	Order entered scheduling oral argument. Copy to parties.	
May 8 1990	Order entered denying defendant's motion to dismiss; and allowing plaintiff's oral motion to file its supplement to its cross-motion by May. 22, 1990 with defendant to respond 30 days after service and plaintiff to reply 14 days after service. Copy to parties.	
May 18 1990	Transcript of proceedings (1 volume) taken at Washington, D.C., on May 7, 1990, filed. Notice to parties.	
mmmm May 22 1990	Plaintiff's supplemental brief in support of its cross-motion filed together with a two volume appendix. Service: 5/22/90.	
May 22 1990	Plaintiff's proposed findings of uncontroverted fact filed. Service: 5/22/90.	
May 25 1990	Judge's order directing parties to file an original and one copy of all future briefs or appendices to other filings filed. Copy to parties.	
Jun 21 1990	Defendant's opposition to plaintiff's "cross-motion" filed. Service: 6/21/90.	
Jun 21 1990	Defendant's responses to plaintiff's proposed findings of uncontroverted fact (Second set) filed. Service: 6/20/90.	
Jul 5 1990	Plaintiff's reply to defendant's opposition to its cross-motion filed. Service: 7/5/90.	
Jul 5 1990	Plaintiff's reply to response to its proposed findings of uncontroverted fact filed. Service: 7/5/90.	
Jul 13 1990	Opinion entered denying plaintiff's 1/25/90 motion to declare the final adverse ruling null and void; and directing parties to file a joint status report by July 27, 1990. Copy to parties.	
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DATE	PROCEEDINGS Bruggink
Jul 27 1990	Joint status report filed by defendant. Service: 7/27/90.
Aug 8 1990	Order entered adopting the schedule in the 7/27/90 status report ie: plaintiff to file its brief, proposed findings of fact, and documentary appendix by October 15, 1990; defendant to file its brief, proposed findings, responses to proposed findings, and appendix 60 days after service of plaintiff's brief; plaintiff to file its reply brief and responses to proposed findings, reply to responses to proposed findings, and any supplemental documentary appendix 45 days after service. Page limitation on breifs are a follows: 80/80/40. Copy to parties.
Oct 15 1990	Plaintiff's brief filed together with a four volume appendix. Service: 10/15/90 by hand.
Oct 15 1990	Plaintiff's proposed findings of uncontroverted fact filed. Service: 10/15/90 by hand.
Dec 14 1990	Defendant's motion for enlargement of time (to January 14, s m y E ^ ^ W ^ E ^ . 1 6 1 , etc_ filed_ service: 12/13/90.
Dec 14 1990	Plaintiff's opposition to motion for enlargement of time filed. Service: 12/14/90.
Dec 14 1990	Defendant's reply to opposition to motion for enlargement of time filed. Service: 12/14/90.
Dec 18 1990	Order granting defendant's 12/14/90 motion; and directing plaintiff's reply brief be filed by June 17, 1991 filed. Copy to parties.
Dec 27 1990	Defendant's motion to withdraw its objections to 5/8/89 motion to include commercialism submission in the administrative record filed. Service: 12/26/90.
Jan 7 1991	DENIED: 1/16/91 SEE ENDORSEMENT ON MOTION.
Jan 14 1991	Defendant's notice of appearance filed. Service: 1/4/91.
Jan 14 1991	Plaintiff's opposition to motion for leave to give notice of withdrawn objection filed. Service: 1/14/91.
Jan 14 1991	Defendant's motion for enlargement of time (to January 21, 1991) to file reply brief filed. Service: 1/11/91. ALLOWED: 1/16/91.
Jan 18 1991	Defendant's motion for enlargement of time (to January 31, 1991) to file brief and other submissions filed. Service: 1/17/91. ALLOWED over opposition. No further requests for extensions may be filed. Service of defendant's submission on plaintiff's counsel must be by hand delivery: 1/24/91.
Jan 31 1991	Defendant's brief on the merits filed together with a two volume appendix. Service: 1/31/91 by hand.
Jan 31 1991	Defendant's proposed findings of fact filed. Service: 1/31/91 by hand.
Jan 31 1991	Defendant's responses to proposed findings of fact filed. Service: 1/31/91 by hand.
May 30 1991	Defendnat's notice of related case (91-1176T) filed. Service: 5/29/19.

C O N T I N U E D O N P A G E 8

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DATE	PROCEEDINGS
	Bruygink
Jun 17 19S1	Plaintiff's reply brief; appendix to reply brief; replies to responses to proposed findings of <i>fact</i> ; responses to proposed findings of fact; appendix of administrative record volumes 1-3; appendix of administrative record volume 4; and administrative record exhibit III-351 (contained in 7 separate volumes) filed. Service: 6/17/91.
Juu 28 1991	Order scheduling oral argument filed. Copy to parties.
Sep 4 1991	Order vacating 6/28/91 order; and rescheduling oral argument filed. Copy to parties.
Sep 9 1991	Plaintiff's motion to supplement the administrative record filed. Service: 9/6/91. SEE ORDER ENTERED MAY 26 1992. DENIED.
Sep 16 1S91	Defendant's motion to strike motion to supplement the administrative record and supporting brief filed. Service: 9/13/91. DENIED AS MOOT BY ORDER ENTERED MAY 26 1992.
Sep 20 1991	Plaintiff's opposition to defendant's motion to strike, etc. filed. Service by hand: 9/20/91.
Oct 1 1991	Defendant's" reply to plaintiff's opposition to motion to strike filed. Service: 9/30/91.
Oct 15 1991	-Order entered directing parties to file supplemental briefs which are not to exceed 20 pages by November 12, 1991. Copy to pasties.
Oct 16 1991	Transcript of proceedings (1 vol.) taken at Washington, DC on October 11, 1991, filed. Notice to parties.
Oct 24 1991	Supplemental information submitted by the United States filed. Service: 10/23/91.
Nov 12 1991	Defendant's supplemental brief filed. Service: 11/12/91.
Nov 12 1991	Plaintiff's supplemental brief filed. Service: 11/12/91.
Nov 21 ii)91	Defendant's motion to strike filed. Service: 11/20/91, GRANTED BY ORDER ENTERED MAY 26 1992.
Dec 4 1991	Plaintiff's motion to strike allegations from defendant's motion to strike filed. Service: 12/4/91. GRANTED BY ORDER ENTERED MAY 26, 1992.
Dae 4 1S91	Plaintiff's opposition to defendant's motion to strike; and brief in support of its motion to strike filed. service: 12/4/S1. /
Dec 11 1991	Defendant's opposition to motion to strike filed. Service: 12/11/91.
Dec 11 19S1	Defendant s reply to response to its motion to strike filed. Service: 12/11/91.
Dec 20 1991	Plaintiff's reply briaif filed. Sec.ce. 12/20/91.

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DATE	PROCEEDINGS	Bruggink
May 26 1992	Order entered on four procedural motions. Copy to parties.	
May 26 1992	Opinion entered directing dismissal of the complaint. Copy to parties.	
May 26 1992	Judgement entered that the complaint is dismissed. Costs to defendant. Copy to parties. VACATED. SEE ORDER OF 7/21/92.	
Jun 8 1992	Plaintiff's motion for reconsideration (Rule 59) of the May 26, 1992 opinion filed. Service: 6/5/92.	
Jun 25 1992	Defendant's bill of costs filed. Service: 6/25/92.	
Jun 29 1992	Judgment entered that the complaint is dismissed. Cost to defendant. Copy to parties.	
Jul 10 1992	Plaintiff's objections to defendant's bill of costs filed. Service: 7/10/92.	
Jul 15 1992	Defendant's reply in support of its bill of costs filed. Service: 7/15/92.	
Jul 21 1992	Order entered vacating the judgment of May 26, 1992. Copy to parties.	
Jul 30 1992	Plaintiff's motion for leave to file response to reply in support of its Bill of Costs filed. Service: 7/30/92. ALLOWED: AUG 13 1992.	
Aug 4 1992	Plaintiff's notice of appeal filed. Copy to defendant and C.A.F.C.'[\$105 fee paid.] CAFC #92-5155.	
Aug 13 1992	Plaintiff's response to defendant's reply in support of its Bill of Costs filed.	
May 4 1993	Mandate of CAFC dated, May 3, 1993, affirming Court of Federal Claims decision filed. Copy to Judge.	