

**ILLINOIS INDEPENDENT TAX TRIBUNAL
CHICAGO, ILLINOIS**

ZANZIBAR LLC,)	
Petitioner)	
v.)	15-TT-114
ILLINOIS DEPARTMENT OF REVENUE,)	
Respondent)	

NOTICE OF FILING
CERTIFICATE OF SERVICE VIA EMAIL

To: Roger J. Hymen, Esq.
Gignilliat & Hymen P.C.
14 Bridlewood Road, Suite 200
Northbrook, IL 60062
Email: law.gnh@gmail.com

PLEASE TAKE NOTICE that on **August 26, 2016**, the Respondent, Department of Revenue of the State of Illinois, filed with the Illinois Independent Tax Tribunal, 160 N. LaSalle Street, Room N506, Chicago, Illinois 60601, the Respondent's Emergency Motion for Extension of the Proposed Final Pretrial Order and the Final Pretrial Conference, a copy of which is attached and served upon you via email, prior to the hour of 5:00 p.m.

Respectfully submitted,

Lisa Madigan, Attorney General
State of Illinois

Date: August 26, 2016 **By:** /s/ Daniel A. Edelstein
Daniel A. Edelstein
Special Assistant Attorney General

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**EMERGENCY MOTION FOR EXTENSION OF THE PROPOSED FINAL
PRETRIAL ORDER AND THE FINAL PRETRIAL CONFERENCE**

NOW COMES the Department of Revenue of the State of Illinois (the “Respondent”), through its attorney, Lisa Madigan, Attorney General of and for the State of Illinois, and respectfully moves this Tribunal for an extension, on an emergency basis, of the due date of the Proposed Final Pretrial Order, and of the date of the Final Pretrial Conference. In support thereof the Respondent states as follows:

1. Pursuant to the last Order entered in this case, the Respondent and Zanzibar LLC (the “Petitioner”) (together, the “Parties”) have until August 26, 2016 to prepare and submit a proposed final pretrial order, and the final pretrial conference is set for September 13.
2. The Petitioner’s counsel made a new settlement offer on May 5, and the Respondent’s counsel promptly provided such to the Respondent’s Audit Bureau for review.
3. On July 20, the Respondent’s counsel received a response from the Audit Bureau, and rejected the Petitioner’s offer and made a counteroffer.
4. Due to a medical issue of the Petitioner’s counsel, and the recent passing of a family member, the Petitioner’s counsel proposed the resumption of settlement negotiations in early August.
5. Due to long-term understaffing in the Department, the undersigned counsel was delayed in responding to the Petitioner’s counsel.
6. Although the last Order entered in this case states that “no further extensions will be granted,” the undersigned counsel for the Respondent was then unable to confer with the Petitioner’s counsel during much of the week of August 15, and a portion of the week of August 22, due to absence from the office on account of illness.
7. The undersigned counsel’s unanticipated absence constitutes an unforeseen emergency warranting the relief requested in this motion.

8. At this time, the Parties' counsel are continuing to negotiate in an effort to settle this matter.
9. The Petitioner's counsel does not object to the relief requested in this emergency motion to extend the due date of the Proposed Final Pretrial Order, and to extend the date of the Final Pretrial Conference.
10. This request is made for good cause and in good faith, and will not prejudice either party.

WHEREFORE, the Respondent respectfully moves this Tribunal for extensions, on an emergency basis, of the due date of the Proposed Final Pretrial Order, to September 16, 2016, of the Final Pretrial Conference, to September 19, 21 or 22, 2016 (the Petitioner's counsel being unavailable on September 20), and for any other relief that is just.

Respectfully submitted,

Lisa Madigan, Attorney General
State of Illinois
Respondent

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