

**ILLINOIS INDEPENDENT TAX TRIBUNAL  
CHICAGO, ILLINOIS**

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<b>WASEEM AHMED,</b>	)	
<b>Petitioner</b>	)	
<b>v.</b>	)	<b>15-TT-135</b>
<b>ILLINOIS DEPARTMENT OF REVENUE,</b>	)	
<b>Respondent</b>	)	

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**NOTICE OF FILING**  
**CERTIFICATE OF SERVICE VIA EMAIL**

To: James E. Dickett  
The Law Office of James E. Dickett, Ltd.  
600 Hillgrove Avenue, Suite 1  
Western Springs, Illinois 60558  
Email: [jdickett@aol.com](mailto:jdickett@aol.com)

**PLEASE TAKE NOTICE** that on **September 2, 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 Second Motion for Extension of the Written and Oral Discovery Deadlines, 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:** September 2, 2016      **By:** /s/ Daniel A. Edelstein  
Daniel A. Edelstein  
Special Assistant Attorney General

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**RESPONDENT’S SECOND MOTION FOR EXTENSION OF THE  
WRITTEN AND ORAL DISCOVERY DEADLINES**

NOW COMES the Department of Revenue of the State of Illinois (“Respondent”), through its attorney, Lisa Madigan, Attorney General of and for the State of Illinois, and respectfully moves this Tribunal for a third extension of the written and oral discovery deadlines. In support thereof Respondent states as follows:

1. Pursuant to the last Order entered in this case, Respondent and Waseem Ahmed (“Petitioner”) (together, the “Parties”) have until September 2, 2016 to exchange documents in written discovery, and to take any depositions.
2. Respondent’s counsel issued Respondent’s written discovery requests to Petitioner’s counsel on May 26.
3. Petitioner’s responses to such requests, which were due June 27, are necessary for Respondent’s counsel to properly prepare for Petitioner’s deposition.
4. On or about August 16, Petitioner’s counsel mailed Petitioner’s answers to Respondent’s First Interrogatories to Petitioner, but such answers are incomplete.
5. In addition, Petitioner has not yet responded to Respondent’s First Requests for Production of Documents to Petitioner.
6. The Parties had scheduled Petitioner’s deposition for September 1, but Respondent’s counsel cancelled such deposition, given the need for the remainder of Petitioner’s responses to Respondent’s written discovery requests.
7. In addition, at this time, Petitioner has not issued any written discovery requests nor scheduled any depositions, should he wish to do so.
8. Petitioner’s counsel does not object to the relief requested in this motion.
9. This request is made for good cause and in good faith, and will not prejudice either party.

WHEREFORE, Respondent respectfully moves this Tribunal for a third extension of the deadline for the Parties to exchange documents in written discovery, and to take any depositions, to October 4, 2016 (due to the Rosh Hashanah holiday on October 3), and for any other relief that is just.

Respectfully submitted,

**Lisa Madigan, Attorney General**  
**State of Illinois**  
Respondent

By: /s/ Daniel A. Edelstein  
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