

**ILLINOIS INDEPENDENT TAX TRIBUNAL
CHICAGO, ILLINOIS**

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|--|---|------------------|
| WASEEM AHMED, |) | |
| Petitioner |) | |
| v. |) | 15-TT-135 |
| ILLINOIS DEPARTMENT OF REVENUE, |) | |
| Respondent |) | |

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

PLEASE TAKE NOTICE that on **June 3, 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 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: June 3, 2016

By: /s/ Daniel A. Edelstein
Daniel A. Edelstein
Special Assistant Attorney General

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**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 an extension of the written and oral discovery deadlines. In support thereof the Respondent states as follows:

1. Pursuant to the last Order entered in this case, the Respondent and Waseem Ahmed (“Petitioner”) (together, the “Parties”) have until June 14, 2016 to exchange documents in written discovery, and to take any depositions.
2. On April 21, the Parties agreed on a date and time for the deposition of Petitioner to be taken.
3. However, due to long-term understaffing in the Department, Respondent’s counsel did not issue Respondent’s written discovery requests to Petitioner’s counsel until May 26.
4. Petitioner’s responses to such requests, due June 27, are necessary for Respondent’s counsel to properly prepare for Petitioner’s deposition.
5. At this time, Petitioner has not issued any written discovery requests nor scheduled any depositions, should it wish to do so.
6. Petitioner’s counsel does not object to the relief requested in this motion.
7. This request is made for good cause and in good faith, and will not prejudice either party.

WHEREFORE, Respondent respectfully moves this Tribunal for an extension of the deadline for the Parties to exchange documents in written discovery, and to take any depositions, to July 14, 2016, and for any other relief that is just.

Respectfully submitted,

Lisa Madigan, Attorney General
State of Illinois
Respondent

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