

**ILLINOIS INDEPENDENT TAX TRIBUNAL
CHICAGO, ILLINOIS**

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 **October 4, 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 Second Joint 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: October 4, 2016

By:


Daniel A. Edelstein
Special Assistant Attorney General

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**SECOND JOINT 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 Waseem Ahmed (“Petitioner”), through his attorneys, The Law Office of James E. Dickett, Ltd., and respectfully move this Tribunal for a fourth extension of the written and oral discovery deadlines. In support thereof Respondent and Petitioner (the “Parties”) state as follows:

1. Pursuant to the last Order entered in this case, the Parties have until October 4, 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 the Parties agree that 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’ counsel have arranged a meeting for October 7, regarding the remainder of Petitioner’s responses to Respondent’s written discovery requests, and are in the process of scheduling Petitioner’s deposition for a date in mid- to late-October.
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. In light of this, counsel for the Parties conferred and both agreed to bring this second joint motion to extend the written and oral discovery deadlines.

9. This request is made for good cause and in good faith, and will not prejudice either party.

WHEREFORE, the Parties respectfully moves this Tribunal for a fourth extension of the deadline for the Parties to exchange documents in written discovery, and to take any depositions, to November 7, 2016, and for any other relief that is just.

Respectfully submitted,

Lisa Madigan, Attorney General
State of Illinois
Respondent

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Waseem Ahmed
Petitioner

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