

**ILLINOIS INDEPENDENT TAX TRIBUNAL  
CHICAGO, ILLINOIS**

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<b>JAMAL CHAUDHARY,</b>	)	
	)	
<b>Petitioner,</b>	)	
v.	)	<b>14-TT-183</b>
<b>ILLINOIS DEPARTMENT OF REVENUE,</b>	)	
	)	
<b>Respondent.</b>	)	

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

To: Akram Zanayed  
Akram Zanayed & Associates  
8550 S. Harlem, Suite G  
Bridgeview, IL 60455  
Email: [Zanayedlaw@gmail.com](mailto:Zanayedlaw@gmail.com)

**PLEASE TAKE NOTICE** that on **February 11, 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 Fourth Joint 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:** February 11, 2016      **By:**   
Daniel A. Edelstein  
Special Assistant Attorney General

**ILLINOIS INDEPENDENT TAX TRIBUNAL  
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<b>JAMAL CHAUDHARY,</b>	)	
<b>Petitioner,</b>	)	
<b>v.</b>	)	<b>14-TT-183</b>
<b>ILLINOIS DEPARTMENT OF REVENUE,</b>	)	
<b>Respondent.</b>	)	

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**FOURTH JOINT 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 Jamal Chaudhary (the “Petitioner”), through his attorneys, Akram Zanayed and Associates, and respectfully move this Tribunal for a fourth extension of the due date of the Proposed Final Pretrial Order, and of the date of the Final Pretrial Conference. In support thereof the Respondent and the Petitioner (the “Parties”) state as follows:

1. Pursuant to the last Order entered in this case, the Parties had until February 10, 2016 to prepare and submit a proposed final pretrial order, and the final pretrial conference is set for February 25.
2. On November 30, 2015, the Petitioner’s counsel provided a draft of the proposed order.
3. Counsel for the Parties have significantly reduced the number of facts and issues which will be contested at hearing, and as of January 22, 2016 determined that the contested facts and issues are capable of further reduction.
4. The resulting potential reductions to the Petitioner’s alleged liability at issue may allow this matter to be settled without the necessity of a hearing.
5. In that vein, the Petitioner’s counsel made a new settlement offer on January 22, and such is currently being reviewed by the Respondent’s Audit Bureau.
6. Prior to the close of business on February 10, counsel for the Parties exchanged email correspondence, agreeing to file this fourth motion to extend the due date of the Proposed Final Pretrial Order, and to extend the date of the Final Pretrial Conference (the “Fourth Motion”), though with the substance to be determined by further correspondence.
7. However, the Respondent’s counsel was absent from the office on February 10 due to illness, and counsel for the Parties therefore did not file this Fourth Motion. *See*

See the email informing this Tribunal of these circumstances, dated February 10, 2016, attached hereto and incorporated herewith as "Exhibit A."

8. Counsel for the Parties have now conferred and both agreed to bring this Fourth Motion.
9. This request is made for good cause and in good faith, and will not prejudice either party.

WHEREFORE, the Parties respectfully move this Tribunal for a fourth extension of the due date of the Proposed Final Pretrial Order, to March 10, 2016, a fourth extension of the Final Pretrial Conference, to the week of March 21, 2016, and for any other relief that is just.

Respectfully submitted,

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

By:   
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**Jamal Chaudhary**  
Petitioner

By:   
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**Edelstein, Daniel**

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**From:** Schriftman, Seth  
**Sent:** Wednesday, February 10, 2016 3:10 PM  
**To:** Barov, Brian  
**Cc:** Edelstein, Daniel; AKRAM ZANAYED  
**Subject:** Jamal Chaudhary v. IDOR

Judge Barov,

I just communicated with Dan Edelstein, who is still out with the flu. He wanted me to inform you that he and Petitioner's counsel in the Jamal Chaudhary v. IDOR matter are working toward a hopeful settlement. He knows that a pretrial order is due today. Dan will be filing a motion in that regard, which will ask for another short extension, when he is back in the office.

Please let me know if you have any questions.

Thank you.

Seth Schriftman

Seth J. Schriftman  
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This message contains the thoughts and opinions of Seth Schriftman and does not represent the official policy of the Illinois Department of Revenue.

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**EXHIBIT A**