

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

MARK CRUMPACKER,

Plaintiff,

v.

CAROLINE CIRAULO-KLEPPER;  
MICHAEL MARTINEAU;  
MARK J. LANGER;  
COMM’R., INTERNAL REVENUE;  
UNITED STATES ATTORNEY GENERAL;  
and  
2 UNKNOWN-NAMED IRS/DOJ ATTORNEYS,

Defendants.

Case No. 1:16-cv-01053 (CRC)

UNITED STATES OF AMERICA,

Counterclaim Plaintiff,

v.

MARK CRUMPACKER;  
MICHAEL B. ELLIS; and  
ROBERT MCNEIL

Counterclaim Defendants.

**ORDER TO SHOW CAUSE**

Upon consideration of the United States’ Second Motion for Order to Show Cause Why Counterclaim Defendants Should not Be Held in Contempt, it is hereby

ORDERED that counterclaim defendants Robert A. McNeil and Michael B. Ellis shall appear before the Honorable Christopher R. Cooper, at the above-referenced court located at 333 Constitution Avenue, N.W., Washington, DC 20001 on March 1, 2018 at 10:00 AM to show cause why they should not be held in contempt for failing to obey the order of permanent injunction entered against them by this Court on April 19, 2017.

It is further ORDERED that:

1. A copy of this Order shall be served in accordance with Rule 4(e) of the Federal Rules of Civil Procedure within fourteen (14) days of the date that this Order is served upon counsel for the United States or as soon thereafter as possible.
2. Proof of service done pursuant to paragraph 1, above, shall be filed with the Clerk as soon as practicable.
3. Counterclaim Defendants shall present any defense or opposition to the United States' Motion in writing, filed with the Clerk and copies served on counsel for the United States at least fourteen (14) days prior to the date set for the show cause hearing. The United States may file a reply memorandum to any opposition at least five (5) days prior to the date set for the show cause hearing.
4. At the show cause hearing, only those issues brought into controversy by the responsive pleadings and factual allegations supported by affidavit or declaration will be considered. Any uncontested allegation will be considered admitted. Counterclaim Defendants are hereby notified that a failure to comply with this Order may subject them to sanctions for contempt of court

**SO ORDERED.**

Date: January 3, 2018

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CHRISTOPHER R. COOPER  
United States District Judge