

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 13-mc-87 (SRN/TNL)

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	STIPULATION AND JOINT
)	REQUEST TO QUASH
v.)	BENCH WARRANT
JOHN K. THORNTON,)	
)	
Respondent.)	

Petitioner United States of America and Respondent John K. Thornton (hereinafter “the Parties”), by counsel, state as follows:

WHEREAS, the parties are presently set to appear before this Court on July 25, 2018, at 11:00 a.m. for further proceedings involving Respondent’s civil contempt;

WHEREAS, the bench warrant for the apprehension of Respondent is stayed pending those proceedings;

WHEREAS, Respondent appeared with counsel on May 21, 2018, at the United States Attorney’s Office in Minneapolis, MN, to provide testimony to the Internal Revenue Service (“IRS”).

WHEREAS, Respondent answered the IRS’s questions and provided additional documentation responsive to the summonses at issue in this lawsuit.

WHEREAS, Respondent voluntarily surrendered additional assets to the IRS on in partial satisfaction of tax debt that is due and owing.

WHEREAS, Respondent filed with the IRS delinquent income tax returns for the tax years at issue in the Income Tax Return summons.

WHEREAS, the parties agree and stipulate that Respondent has complied with the two summonses at issue in this lawsuit.

THEREFORE, the parties by counsel stipulate and jointly request that the Court issue an order as follows:

1. Respondent John K. Thornton be released from the Court's finding of constructive civil contempt on March 27, 2015 [Doc. No. 85].
2. The bench warrant for the apprehension of Respondent John K. Thornton [Doc. No. 102] be quashed.
3. The hearing in this matter presently set for July 25, 2018, at 11:00 a.m. be stricken from the calendar.

SIGNATURE PAGE FOLLOWS

Dated: 7/11/18

s/ Thomas E. Brever
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Dated: 7/11/18

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