

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

JANE DOES, individually and )  
on behalf of others similarly situated, )

Plaintiffs, )

v. )

Case No. 2:20-cv-00704 JPS

DONALD J. TRUMP, in his individual and official )  
capacity as President of the United States; )

MITCH MCCONNELL, in his individual and )  
official capacity as a Senator and Sponsor of )

S. 3548 CARES Act; NANCY PELOSI, in her )  
individual and official capacity as Speaker for the )

U.S. House of Representatives; CHARLES )  
SCHUMER, in his individual and official capacity )

as a Senator and U.S. Senate Minority Leader; )  
STEVEN MNUCHIN, in his individual and official )

capacity as the Acting Secretary of the U.S. )  
Department of Treasury; CHARLES RETTIG, in )

his individual and official capacity as U.S. )  
Commissioner of Internal Revenue; U.S. )

DEPARTMENT OF THE TREASURY; the )  
U.S. INTERNAL REVENUE SERVICE; and the )

UNITED STATES OF AMERICA, )  
Defendants. )

**JOINT STIPULATION TO STAY THIS ACTION**

NOW COME Plaintiffs, JANE DOES, individually and on behalf of others similarly situated, and Defendant, THE UNITED STATES OF AMERICA, by and through their respective counsel, and for this Joint Stipulation to Stay this Action, state as follows:

WHEREAS, on June 30, 2020, Counsel for Defendant filed its Motion to Dismiss or, in the Alternative, to Stay;

WHEREAS, pursuant to this Honorable Court's Text Only Order on July 22, 2020, Plaintiffs were given until August 14, 2020 to respond to Defendant's Motion to Dismiss or, in the Alternative, to Stay;

WHEREAS, the Parties have agreed to Stay this Action until a final decision has been rendered wherein a class has been certified in one of the following actions: *Doe v. Trump et al.*,

Case No. 1:20-cv-02531, pending in the Northern District of Illinois; *Doe et al. v. Trump et al.*, Case No. 8:20-cv-00858, pending in the Central District of California; *Uzoegwu v. Mnuchin et al.*, Case No. 1:20-cv-03264, pending in the Southern District of New York; *Amador et al. v. Mnuchin et al.*, Case No. 1:20-cv-01102, pending in the District of Maryland; and *R.V. et al. v. Mnuchin et al.*; Case No. 8:20-cv-01148, pending in the District of Maryland.

NOW, THEREFORE, SUBJECT TO THE COURT'S APPROVAL, IT IS HEREBY STIPULATED AND AGREED that:

This Action shall be Stayed until a final decision has been rendered wherein a class has been certified in one of the following actions: *Doe v. Trump et al.*, Case No. 1:20-cv-02531, pending in the Northern District of Illinois; *Doe et al. v. Trump et al.*, Case No. 8:20-cv-00858, pending in the Central District of California; *Uzoegwu v. Mnuchin et al.*, Case No. 1:20-cv-03264, pending in the Southern District of New York; *Amador et al. v. Mnuchin et al.*, Case No. 1:20-cv-01102, pending in the District of Maryland; and *R.V. et al. v. Mnuchin et al.*; Case No. 8:20-cv-01148, pending in the District of Maryland.

Dated: August 7, 2020

By: /s/ Thomas J. Nitschke  
THOMAS J. NITSCHKE  
WI Bar No. 1023258  
Blaise & Nitschke, P.C.  
123 N. Wacker Drive, Suite 250  
Chicago, Illinois 60606  
T: (312) 448-6602  
F: (312) 803-1940  
[tjnitschke@blaisenitschkelaw.com](mailto:tjnitschke@blaisenitschkelaw.com)  
*Attorney for Plaintiffs*

By: /s/ Charles P. Hurley  
CHARLES P. HURLEY  
Washington, D.C. Bar No. 490793  
Trial Attorneys Tax Division  
U.S. Department of Justice  
P.O. Box 7238

Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 305-6717  
[Charles.P.Hurley@usdoj.gov](mailto:Charles.P.Hurley@usdoj.gov)  
*Attorney for the United States*

IT IS SO ORDERED

DATE: \_\_\_\_\_

\_\_\_\_\_  
District Judge J. P. Stadtmueller

Prepared by:  
**Blaise and Nitschke, P.C.**  
123 N. Wacker, Suite 250  
Chicago, IL 60606  
T: (312) 448-6602  
F: (312) 803-1940  
[tjnitschke@blaisenitschkelaw.com](mailto:tjnitschke@blaisenitschkelaw.com)  
WI Bar No. 1023258