

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

In re:	)	Case No. 18-30903
	)	Chapter Ch. 7
JEREMY WYATT LECLAIR,	)	
	)	
Debtor.	)	
_____	)	Adv. Proc. No. 18-03043
	)	
JEREMY WYATT LECLAIR,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	
_____	)	

**CONSENT MOTION FOR AN EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

The United States, with consent of the plaintiff, moves for additional time in which to file an answer or otherwise plead. The United States' responsive pleading is due August 8, 2018. The United States seeks a 30-day extension until September 7, 2018, to respond to the complaint. In support of its motion, the United States avers as follows:

1. The petition in the associated Chapter 7 bankruptcy proceeding, *In re LeClair*, No. 18-30903, was filed on June 12, 2018.
2. The instant adversary proceeding complaint was filed on July 6, 2018. The United States' answer is due August 8, 2018.
3. On July 26, 2018, the United States moved to dismiss the Chapter 7 bankruptcy proceeding for improper venue. The same day, the debtor moved to transfer the case to

the Central District of California. A hearing is scheduled on these motions for August 27, 2018.

4. The United States requests additional time for two reasons. *First*, this case was assigned to the undersigned counsel on July 30, 2018. The United States is still gathering the necessary information to properly answer the complaint. *Second*, the parties are working on a resolution to transfer the underlying bankruptcy case, which may include transferring this adversary proceeding.
5. Plaintiff's counsel has consented to the United States' request for additional time to respond to the adversary complaint.

WHEREFORE, the United States respectfully requests that the Court grant this motion and extend the United States' time in which to answer or otherwise plead until September 7, 2018.

Date: August 8, 2018

/s/ Stephanie Sasarak

STEPHANIE SASARAK  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 227  
Washington, D.C. 20044  
Telephone: (202) 307-2089  
Fax: (202) 514-6866  
Stephanie.A.Sasarak@usdoj.gov

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

OF COUNSEL  
R. ANDREW MURRAY  
United States Attorney

**CERTIFICATE OF SERVICE**

I certify that on August 8, 2018, I electronically filed the foregoing CONSENT MOTION with the Clerk of the Court using the CM/ECF system, which shall send notification of that filing to all parties registered to receive such notice, including plaintiff's counsel.

/s/ Stephanie Sasarak  
STEPHANIE SASARAK