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Counsel for the United States of America

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
DIONNE WARWICK,)
Defendant.)

COMPLAINT TO REDUCE TAX ASSESSMENTS TO JUDGMENT

The United States of America, pursuant to 26 U.S.C. § 7401, at the request of the Chief Counsel of the Internal Revenue Service, a delegate of the Secretary of the Treasury, and at the direction of the Attorney General of the United States commences this civil action. In support of this action, the United States alleges as follows:

NATURE OF THE ACTION

1. This is a civil action in which the United States seeks to reduce to judgment federal tax assessments made against the defendant Dionne Warwick for the years 1997, 1998, 1999, and 2007.

JURISDICTION AND VENUE

2. Jurisdiction over this action is conferred upon this court by virtue of 28 U.S.C. §§ 1331, 1340 and 1345 and 26 U.S.C. § 7402 (a).

3. Venue is proper in this district and division under 28 U.S.C. §1396.
4. The ten year statute of limitations on collection for the tax assessments, set forth in paragraph 8, was suspended for the following discrete periods of time by virtue of 26 U.S.C. § 6503:

- A. On or about August 3, 2000, Warwick submitted an offer in compromise to the Internal Revenue Service to compromise the tax liabilities for the years 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, and 1999. Warwick withdrew her offer in compromise on or about February 6, 2003. The statute of limitations was suspended during the pendency of the offer in compromise plus thirty days thereafter.
- B. On or about June 4, 2004, Warwick submitted a second offer in compromise to the Internal Revenue Service to compromise the tax liabilities for the years 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, and 1999. The Internal Revenue Service rejected the offer in compromise on or about February 18, 2005. During the pendency of the offer in compromise, the Service was prohibited from issuing administrative levies to collect Warwick's tax liabilities. The statute of limitations was suspended during the pendency of the offer in compromise plus thirty days thereafter.
- C. On or about December 21, 2006, Warwick submitted a third offer in compromise to the Internal Revenue Service to compromise the tax liabilities for the years 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, and 1999. The Internal Revenue Service accepted the offer on or about August 21, 2007. Warwick defaulted on the offer on or about April 27, 2009. During the pendency of the offer in compromise, the Service was prohibited from issuing administrative levies to collect Warwick's tax liabilities. The statute of limitations was suspended during the pendency

of the offer in compromise plus thirty days thereafter. The statute of limitations was suspended during the pendency of the offer in compromise plus thirty days thereafter.

- D. On or about October 21, 2009, Warwick submitted a fourth offer in compromise to the Internal Revenue Service to compromise the tax liabilities for the years 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, and 2007. The Internal Revenue Service rejected the offer in compromise on or about December 15, 2010. During the pendency of the offer in compromise, the Service was prohibited from issuing administrative levies to collect Warwick's tax liabilities. The statute of limitations was suspended during the pendency of the offer in compromise plus thirty days thereafter.
- E. On or about February 28, 2011, Warwick submitted an installment agreement with the Internal Revenue Service with regard to her tax liabilities for the years 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, and 2007. The Internal Revenue Service rejected the installment agreement on or about June 12, 2012. During the pendency of Warwick's request for the installment agreement, the Service was prohibited from issuing administrative levies to collect her tax liabilities. The statute of limitations was suspended during the pendency of the installment agreement plus thirty days thereafter.
- F. On or about August 28, 2012, Warwick submitted a fifth offer in compromise to the Internal Revenue Service to compromise the tax liabilities for the years 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, and 2007. The Internal Revenue Service rejected the offer in compromise on or about September 14, 2012. The statute of limitations was suspended

during the pendency of the offer in compromise plus thirty days thereafter.

G. On March 21, 2013, defendant Dionne Warwick filed a petition for relief under Chapter 7 of the Bankruptcy Code, 11 U.S.C., in the United States Bankruptcy Court for the District of New Jersey. *In re Dionne Warwick*, Case No. 13-15875-MS. Defendant Dionne Warwick received her discharge on June 28, 2013. The statute of limitations was suspended during the pendency of the bankruptcy plus sixty days thereafter.

PARTIES

- 5. Plaintiff is the United States of America.
- 6. Defendant Dionne Warwick resides in South Orange, New Jersey, within this judicial district.

CLAIM FOR RELIEF

- 7. Plaintiff incorporates herein by reference the allegations set forth in paragraphs 1 through 6 of the complaint.
- 8. On the dates set forth below, a delegate of the Secretary of the Treasury made assessments against, gave notice of, and made demand for payment upon the Taxpayer, Dionne Warwick, for unpaid federal income taxes (Form 1040) and statutory additions to tax, for the 1997, 1998, 1999, and 2007 taxable years in the amounts hereinafter indicated:

Taxable Period Ending	Date of Assessment	Amount of Assessment	Balance Due as of 8/1/2014
1997 (1040)	10/19/1998	\$ 213,634 (1)	\$1,713,130.00
	10/19/1998	\$ 2,554 (2)	
	10/19/1998	\$ 2,213 (2)	
	10/19/1998	\$ 2,645 (3)	

Taxable Period Ending	Date of Assessment	Amount of Assessment	Balance Due as of 8/1/2014
	03/26/2001	\$ 543,849 (1)	
	03/26/2001	\$ 138,212 (3)	
	09/17/2007	\$ 149,558 (2)	
	09/17/2007	\$388,171 (3)	
	04/20/2009	\$139,619 (3)	
1998 (1040)	05/31/1999	\$ 2,839 (1)	\$1,814,874.00
	03/26/2001	\$ 693,054 (1)	
	03/26/2001	\$ 111,292 (2)	
	09/17/2007	\$ 173,264 (2)	
	09/17/2007	\$ 408,100 (3)	
	04/20/2009	\$ 147,845 (3)	
1999 (1040)	06/19/2000	\$ 62,110(1)	\$100,363.00
	06/19/2000	\$ 2,890 (2)	
	06/19/2000	\$ 482 (2)	
	06/19/2000	\$ 564 (3)	
	03/25/2002	\$ 6,002 (1)	
	09/17/2007	\$ 7,306 (3)	
	09/17/2007	\$9,046 (2)	
	09/17/2007	\$ 24,427 (3)	
	04/20/2009	\$ 8,169 (3)	
2007 (1040)	11/17/2008	\$ 59,884 (1)	\$39,079.00
	11/17/2008	\$ 929 (2)	
	11/17/2008	\$ 974 (2)	
	11/17/2008	\$ 814 (3)	
	04/20/2009	\$ 478 (3)	
	04/20/2009	\$487 (2)	

Taxable Period Ending	Date of Assessment	Amount of Assessment	Balance Due as of 8/1/2014
	05/04/2009	\$ 560.72(2)	

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- (1) Federal income taxes assessed
(2) Penalty
(3) Statutory interest

9. Interest, costs, and statutory additions have accrued on the unpaid balance of the tax assessments since the dates of assessments, and will continue to accrue.
10. Several credits have been applied to the assessments described in paragraph 8.
11. Despite notice and demand for payment, the Taxpayer, Dionne Warwick, has neglected or refused to fully pay to the United States the tax assessments described in paragraph 8, above, together with the statutory additions to tax and interest which have accrued thereon as provided by law.
12. As a result of its failure to fully pay the tax assessments described in paragraph 8, above, Dionne Warwick is indebted to the United States for the unpaid balance of the federal tax assessments made against her for the 1997, 1998, 1999, and 2007 tax years in the amount of \$3,667,447, as of August 1, 2014, together with accrued statutory additions to tax and interest as provided by law.

WHEREFORE, the plaintiff, United States of America, prays:

- A. That the Court render judgment in favor of the United States and against defendant Dionne Warwick in the amount of \$3,667,447 as of August 1, 2014, together with all interest and penalties that have accrued and will continue accruing according to law relating to the income tax, penalties, and interest for the years 1997, 1998, 1999, and 2007.
- B. That the Court award the United States such other and further relief, including the costs of this action, that the Court deems appropriate.

DATE: August 27, 2014

TAMARA W. ASHFORD
Acting Assistant Attorney General

/s/ Beatriz T. Saiz
BEATRIZ T. SAIZ
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JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS UNITED STATES OF AMERICA</p> <p>(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, Email and Telephone Number) Beatriz T. Saiz, Trial Attorney, U.S. Department of Justice, Tax Division Ben Franklin Station, P.O. Box 227, Washington, D.C. 20044 (202) 307-6585</p>	<p>DEFENDANTS DIONNE WARWICK</p> <p>County of Residence of First Listed Defendant <u>New Jersey</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known)</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input checked="" type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width:100%;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. NATURE OF SUIT (Place an "X" in One Box Only)

<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury - Medical Malpractice</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 367 Health Care Pharmaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>FORFEITURE/PENALTY</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Management Relations</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 751 Family and Medical Leave Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Employee Retirement Income Security Act</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input checked="" type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609</p>	<p>OTHER STATUTES</p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
<p>REAL PROPERTY</p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p>CIVIL RIGHTS</p> <p><input type="checkbox"/> 440 Other Civil Rights</p> <p><input type="checkbox"/> 441 Voting</p> <p><input type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 445 Amer. w/Disabilities - Employment</p> <p><input type="checkbox"/> 446 Amer. w/Disabilities - Other</p> <p><input type="checkbox"/> 448 Education</p>	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <p><input type="checkbox"/> 463 Alien Detainee</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p>Other:</p> <p><input type="checkbox"/> 540 Mandamus & Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement</p>		

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. Section 1331, 1340 and 1345

Brief description of cause:
reduce to judgment federal tax assessments

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 3,667,447.00

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE Michael B. Kaplan DOCKET NUMBER Adv. No. 13-1938

DATE 8/27/14 SIGNATURE OF ATTORNEY OR PARTY *[Signature]*

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: in land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; NOTE: federal question actions take precedence over diversity cases.)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- Date and Attorney Signature.** Date and sign the civil cover sheet.