## In the Supreme Court of the United States

HANNA KARCHO POLSELLI, ABRAHAM & ROSE, P.L.C., AND JERRY R. ABRAHAM, P.C., PETITIONERS

υ.

INTERNAL REVENUE SERVICE

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

## MOTION FOR LEAVE TO DISPENSE WITH PREPARATION OF A JOINT APPENDIX

Raza Rasheed SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 300 South Grand Ave., Ste. 3400 Los Angeles, CA 90071

Maurice A. Rose Jerry Abraham ABRAHAM & ROSE, P.L.C. 2600 W. Big Beaver Rd. Troy, MI 48084 Shay Dvoretzky

Counsel of Record

Parker Rider-Longmaid

Kyser Blakely

Hanaa Khan

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

1440 New York Ave. NW

Washington, DC 20005

202-371-7000

shay.dvoretzky@skadden.com

Counsel for Petitioners

January 19, 2023

## MOTION FOR LEAVE TO DISPENSE WITH PREPARATION OF A JOINT APPENDIX

Pursuant to Supreme Court Rule 26.8, Petitioners respectfully seek leave to dispense with the requirement of a joint appendix in this case. I am authorized to state that counsel for Respondent agrees that a joint appendix is not necessary and concurs in the filing of this motion.

The opinions of the lower courts, relevant statutory provisions, and relevant portions of the record are appended to the petition for a writ of certiorari. The parties agree that no other portion of the record merits special attention such as would warrant the preparation and expense of a joint appendix, and that preparation of a joint appendix would not materially assist the Court in its consideration of the case.

For the foregoing reasons, the motion to dispense with the preparation of a joint appendix should be granted.

Respectfully submitted,

Raza Rasheed SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 300 South Grand Ave., Ste. 3400 Los Angeles, CA 90071

Maurice A. Rose Jerry Abraham ABRAHAM & ROSE, P.L.C. 2600 W. Big Beaver Rd. Troy, MI 48084 Shay Dvoretzky
Shay Dvoretzky
Counsel of Record
Parker Rider-Longmaid
Kyser Blakely
Hanaa Khan
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
1440 New York Ave. NW
Washington, DC 20005
202-371-7000
shay.dvoretzky@skadden.com

Counsel for Petitioners

January 19, 2023