

US TAX COURT
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US TAX COURT
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WESTERN DIGITAL CORPORATION AND
SUBSIDIARIES, ET AL.,

Petitioners,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent

ELECTRONICALLY FILED

Docket No. 18984-18,

4818-19

PETITIONERS' MOTION FOR LEAVE TO FILE SUR-REPLY TO
REPLY TO RESPONSE TO MOTION FOR PARTIAL SUMMARY
JUDGMENT

2. On May 1, 2020, the Court issued an order setting deadlines for a response and reply.

3. On June 15, 2020, petitioner filed a response (“Petitioner’s Response”) in accordance with the Court’s May 1, 2020 order.

4. On July 15, 2020, respondent filed a reply to Petitioner’s Response (“Respondent’s Reply”).

5. Respondent’s Reply contains several false or misleading assertions. Petitioner respectfully requests permission to file the short sur-reply lodged with this motion solely for the limited purpose of identifying and responding to those assertions so that the Court does not rely on misinformation.

Respectfully submitted,

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Dated: July 21, 2020