Department of the Treasury Internal Revenue Service Office of Chief Counsel

Notice

CC-2004-016

April 14, 2004

Subject: Chief Counsel Signature Blo	k Cancel Date : December 31, 2004
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The purpose of this Notice is to advise all Chief Counsel employees of a necessary modification to the signature block on all documents signed <u>and</u> filed with the United States Tax Court, correspondence sent to the Department of Justice, and other documents prepared on behalf of the Chief Counsel.

Section 7452 provides that the Commissioner shall be represented by the Chief Counsel for the Internal Revenue Service or his delegate in proceedings in the United States Tax Court. Donald L. Korb was sworn in as Chief Counsel on April 14, 2004. Accordingly, the following signature block should be used on all documents to be filed with the Tax Court, starting April 15, 2004, and thereafter.

> DONALD L. KORB Chief Counsel Internal Revenue Service

By: _

ATTORNEY NAME Attorney Tax Court Bar No. AA0000 Street Address City, State 00000 Telephone: (000) 000-0000

 A similar signature block should be used on all other documents and correspondence signed and dated April 15, 2004, or thereafter, for which the appropriate titular authority is the Chief Counsel, <u>e.g.</u>, letters addressed to the Department of Justice.

If a document has been signed, but not yet sent to the Tax Court or to the Department of Justice, it should not be reexecuted. Instead a sticker with the new Chief Counsel signature block may be affixed over the old signature block.

For those cases where Mr. Korb previously represented the taxpayer and other cases from which he is recused (a recusal list will be provided shortly), the signature block should provide:

EMILY A. PARKER Acting Chief Counsel Internal Revenue Service

By: _

ATTORNEY NAME Attorney Tax Court Bar No. AA0000 Street Address City, State 00000 Telephone: (000) 000-0000

For those cases where Mr. Korb and Ms. Parker either previously represented the taxpayer or are recused, the signature block should provide:

NICHOLAS J. DeNOVIO Acting Chief Counsel Internal Revenue Service

By: _

ATTORNEY NAME Attorney Tax Court Bar No. AA0000 Street Address City, State 00000 Telephone: (000) 000-0000 Local counsel should advise local Appeals offices of the need for the new signature block in decision documents that will be signed and dated after April 15, 2004.

If you have any questions regarding the matters discussed in this Notice, please contact Branch 3, Administrative Provisions and Judicial Practice Division at (202) 622-7940.

/s/ DEBORAH A. BUTLER Associate Chief Counsel (Procedure & Administration)