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847 F.2d 838 Unpublished Disposition NOTICE:
Federal Circuit Local Rule 47.8(b) states that opinions and orders which are designated as not citable as precedent shall not be employed or cited as precedent. This does not preclude assertion of issues of claim preclusion, issue preclusion, judicial estoppel, law of the case or the like based on a decision of the Court rendered in a nonprecedential opinion or order. UNITED STATES of America, Plaintiff-Appellant, v. INTERNATIONAL PRIVATE INVESTMENT CORPORATION and R.W. Daniel, Jr., Defendants-Appellees. No. 87-1232. United States Court of Appeals, Federal Circuit. March 11, 1988. Before BISSELL, Circuit Judge, BALDWIN, Senior Circuit Judge, and MAYER, Circuit Judge. ORDER MAYER, Circuit Judge. 1 The United States appeals from a final judgment entered in the United States District Court for the Southern District of California in favor of appellees. The district court held that

the Internal Revenue Service (IRS) was barred by the statute of limitations from collecting taxes assessed against the International Private Investment Corporation (IPIIC) and Mr. Daniel under 26 U.S.C. Sec. 6321 (1982) because the assessment was untimely made. The district court granted an earlier final judgment on a counterclaim for recovery of \$57,465.00 that the United States had seized from IPIIC. We reverse and remand. 2

This appeal is unusual in that the district court's jurisdiction to enter the final judgment was founded on 28 U.S.C. Secs. 1331 and 1345 (1982), which provide that the district courts shall have original jurisdiction of any civil action "commenced by the United States." The United States and IPIIC have stipulated that the United States commenced this action by sending a "Notice and Demand for Payment" letter to IPIIC on July 23, 1984. The district court found that this letter constituted a "Notice and Demand for Payment" under 26 U.S.C. Sec. 6321 (1982). 3 Section 6321 provides for a lien in favor of the United States on all property of a taxpayer "upon which there is a lien." Thus, the fact that the United States

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Join us now to find out how to easily resolve your Windows 7 problems by running the autoruns command. The first Run dialog box will display, among other things, the processes created at logon time and the programs that started with your current account (Figure 8-5). 25 Jul Last updated: Â .Exposure to low-level laser therapy in mice induces the apoptosis of mast cells. The aim of this study was to evaluate the presence of apoptosis after exposure to laser therapy in mast cells. We evaluated the presence of apoptosis in mast cells of C3H/HeJ mice treated with 532-nm diode laser (12 J/cm²). The presence of apoptosis was evaluated by flow cytometry in samples of the spleen, peritoneal mast cells and the anterior pituitary gland. Mast cells were treated with diode laser irradiation at the dose of 12 J/cm² and after 3, 6, and 24 hr. The number of apoptotic cells was increased after 3 and 6 hr after laser therapy. Mast cells are the target of apoptosis after laser irradiation in a dose-dependent manner. Asia's Hidden Gems: Thailand For Australians, Thailand is

synonymous with the holiday island of Phuket, with its scenic beaches, tropical weather and iconic places like Patong Beach. For those of us outside of Thailand, it can feel rather 'other' or 'tragic'. Apart from the occasional export of cheap electronics and Victoria Bitter beer, it seems almost completely invisible in our cultural view of the rest of the world. It's true that Thailand is bursting with life. The bustling, multi-cultural metropolis of Bangkok thrums with action on a daily basis. Beaches for swimming, markets for browsing and food for eating, Bangkok has a little bit of everything and you don't even need to be on vacation to enjoy the experience. While the landlocked city of Bangkok may be the most obvious and accessible stop on your journey, there are many more hidden gems to be found on the streets of Thailand. The following are a few of the best cities to visit in the south of the country. Nan Province It's easy to miss Nan Province if you're not familiar with Thailand. Away from the main tourist highways, the south of Thailand is a vast plateau punctuated by mountain ranges of every shape and size. The majority of tourists head west to the island of Phuk 0cc13bf012

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