

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CENTER FOR TAXPAYERS RIGHTS, *et al.*,

Plaintiff,

v.

INTERNAL REVENUE SERVICE, *et al.*,

Defendant.

Civil Action No. 25-457 (CKK)

**ORDER**

(January 21, 2026)

Upon consideration of Defendants' [64] Consent Motion to Stay and for good cause shown, it is hereby:

**ORDERED** that Defendants' [64] Consent Motion is **GRANTED** and that this proceeding is stayed pending the outcome of the D.C. Circuit's decision in *Center for Taxpayer Rights v. IRS*, No. 26-5006, at which time the parties will submit a joint status report within 14 days of the D.C. Circuit's decision;

**ORDERED** that the Court's November 21, 2025, [53] Order shall remain in effect while this proceeding is stayed pending appeal;

**ORDERED** that, during the stay, Defendants shall inform Plaintiffs with three (3) days advance notice before the IRS (1) creates a new Application Programming Interface ("API") that shares return information or taxpayer return information with agencies outside the IRS, or (2) uses an API created after February 2025 to share return information or taxpayer return information with agencies outside the IRS;

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**ORDERED** that either party can move the Court to lift the stay at any time, and in the event either party chooses to do so, the parties shall submit a joint status report setting a proposed schedule for the next steps in the proceeding within ten (10) days after the Court lifts the stay.

**SO ORDERED.**

**Dated:** January 21, 2026

  
COLLEEN KOLLAR-KOTELLY  
United States District Judge