

United States Court of Appeals
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 24-5246**September Term, 2024****1:23-cv-02711-RC****Filed On:** February 28, 2025

Robert Hunter Biden,

Appellee

v.

Internal Revenue Service,

Appellee

Gary Shapley and Joseph Ziegler,

Appellants

BEFORE: Childs, Pan, and Garcia, Circuit Judges**ORDER**

Upon consideration of the motion for summary affirmance, the response thereto, and the reply, it is

ORDERED that the motion for summary affirmance be denied. The merits of the parties' positions are not so clear as to warrant summary action. See Taxpayers Watchdog, Inc. v. Stanley, 819 F.2d 294, 297 (D.C. Cir. 1987) (per curiam).

Because the court has determined that summary disposition is not in order, the Clerk is instructed to calendar this case for presentation to a merits panel.

Per Curiam