

November 7, 2005

Charles R. Fulbruge III
Clerk

IN THE UNITED STATES COURT OF APPEALS

FOR THE FIFTH CIRCUIT

No. 03-60992

ALBERT STRANGI, Deceased, Rosalie Gulig, Independent
Executrix,

Petitioner - Appellant,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent - Appellee.

Petition for Review of an Order of the
Internal Revenue Service (Tax Ct)

ON PETITION FOR REHEARING

Before REAVLEY, JOLLY, and PRADO, Circuit Judges.

PER CURIAM:

IT IS ORDERED that the unopposed petition for rehearing is GRANTED. This case is REMANDED to the Tax Court for the limited purpose of determining allowable administrative expenses, including attorney's fees.