

November 7, 2005

Charles R. Fulbruge III  
Clerk

IN THE UNITED STATES COURT OF APPEALS

FOR THE FIFTH CIRCUIT

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No. 03-60992

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ALBERT STRANGI, Deceased, Rosalie Gulig, Independent  
Executrix,

Petitioner - Appellant,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent - Appellee.

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