GUIDE TO RULES AMENDMENTS AND NOTES

Table I

Citations to the Comprehensive Revision and Amendments to the Tax Court Rules of Practice and Procedure as They Appear in the United States Tax Court Reports

Comprehensive Revision of the Tax Court Rules of Practice and Procedure

60 T.C. 1057-1175

Amendments to the Tax Court Rules of Practice and Procedure

- 64 T.C. 1177-1191
- 68 T.C. 1025-1061
- 71 T.C. 1177-1229
- 77 T.C. 1425-1429
- 79 T.C. 1135-1160
- 81 T.C. 1043-1079
- 82 T.C. 1069-1087
- 85 T.C. 1121-1139
- 87 T.C. 1555-1561
- 90 T.C. 1353-1383
- 93 T.C. 821-1115
- 109 T.C. 507-771
- 120 T.C. 479-786
- 125 T.C. 339-352
- 128 T.C. 229-231
- 130 T.C. 345-665
- 134 T.C. 304-384

135 T.C. 617

136 T.C. 603-650

139 T.C. 521-582

153 T.C. 243-298

Table II

Citations to the Notes to the Tax Court Rules of Practice and Procedure as They Appear in the United States Tax Court Reports

An Introduction to the comprehensive revision of the Tax Court Rules of Practice and Procedure approved by the Court on May 29, 1973, appears at 60 T.C. 1057-1058.

A Prefatory Note to the extensive amendments to the Tax Court Rules of Practice and Procedure approved by the Court on January 12, 1990, appears at 93 T.C. 821.

A Prefatory Note to the extensive amendments to the Tax Court Rules of Practice and Procedure approved by the Court on September 12, 1997, appears at 109 T.C. 507.

A Prefatory Note to the extensive amendments to the Tax Court Rules of Practice and Procedure approved by the Court on November 15, 2002, appears at 120 T.C. 479.

A Prefatory Note to the substantial revisions to the Tax Court Rules of Practice and Procedure generally effective as of October 3, 2008, appears at 130 T.C. 345.

A Prefatory Note to the substantial revisions to the Tax Court Rules of Practice and Procedure generally effective as of January 1, 2010, appears at 134 T.C. 304.

A Prefatory Note to the substantial revisions to the Tax Court Rules of Practice and Procedure generally effective as of May 5, 2011, appears at 136 T.C. 603.

A Prefatory Note to the substantial revisions to the Tax Court Rules of Practice and Procedure generally effective as of July 6, 2012, appears at 139 T.C. 521.

A Prefatory Note to the substantial revisions to the Tax Court Rules of Practice and Procedure generally effective as of November 30, 2018, and July 15, 2019, appears at 153 T.C. 243.

Rule	/Title	Note			
		T.C.	Volume	<u>P</u>	<u>age</u>
Title	e I				
Rule	1(a)		60 125 130	3	069 40-341 74-375¹
	1(b)		125 130		40-341 74-375
	1(c)		125 130		40-341 74-375
	1 (d) ²		60 125 130	3	069 40-341 74-375
Rule	2(a)		60 71 81 82 93 109	1 1 1 8 5	069 179 045 071 45 31 07-508
	2 (b)		60	1	069
Rule	3		60	1	070
	3(a)		60 93		070 45-846
	3 (b)		60	1	070

 $^{^1\}mathrm{The}$ Note to the amendment of Rule 1, effective September 20, 2005, was originally published in T.C. Volume 125. It was included in T.C. Volume 130 as part of a substantial revision and republication of the Rules.

 $^{^2\}mbox{Paragraph}$ (d) was formerly designated as paragraph (b). See 130 T.C. 374-375, 60 T.C. 1069.

	3 (c)	60 71	1070 1180
	3 (d)	71 85 93	1180 1123 845-846
	3 (e) ³	60 71	1070 1180
	3(f) ³	60 71	1070 1180
	3 (g) ³	60 71	1070 1180
	$3 (h)^3$	60 71 93	1070 1180 845-846
	3(i)	153	245
Title	e II		
Rule	10(a)	60	1070
	10(b)	60 93	1071 847
	10(c)	60	1071
	10 (d)	60 71 93 136	1071 1180 847 604
	10(e)	71 85	1180 1124
Rule	11	60 87	1071 1557

 $^{^3\}mbox{Paragraphs}$ (e), (f), (g), and (h) were originally designated as paragraphs (d), (e), (f), and (g), respectively. See 71 T.C. 1179-1180, 60 T.C. 1070.

		93 109 120 130 134 153	847 532-533 509 378 305 246
Rule	12 (a)	60 93 134 136	1071 848 306 605
	12 (b)	60 93	1072 848
	12(c)	60 120	1072 510
Rule	13(a)	60 71 77 90 93 109 130	1072 1181 1427 1355-1356 850 535 380-381 247
	13(b)	71 90 93 109 130 153	1181 1355-1356 850 535 380-381 247
	13(c) ⁴	60 71 90 93 109 120	1072 1181 1355-1356 850 535 511-512

 $^{^4\}mathrm{Paragraphs}$ (c) and (d) were originally designated as paragraphs (b) and (c), respectively. See 71 T.C. 1181, 60 T.C. 1072.

		130 153	380-381 247
	13 (d) ⁴	60 71 85 93	1072 1181 1124 850
	13(e)	81 93 153	1046 850 247
Title	e III		
Rule	20(a)	60 71 90 93 109 120 153	1073 1182 1356 851 536 512-513 249
	20 (b)	130	382-383
	20(c)	134 136 153	307-308 606-607 249
	20 (d) ⁵	60 77 85 93 130 134 139	1073 1428 1125 851 383 308 524
Rule	21 (a)	60 81	1073 1047
	21(b)(1)	60 71	1073 1183

 $^{^5\}mbox{Paragraph}$ (d) was formerly designated as paragraph (c), which was originally designated as paragraph (b). See 134 T.C. 307-308, 130 T.C. 383, 60 T.C. 1073.

		130 134	385-386 310-312
	21(b)(2)	60 71 81 130	1074 1183 1047 385-386
	21(b)(3)	60	1075
	21(b)(4)	71 81 109 130	1184 1047 537 386
	21(b)(5)	130	386
Rule	226	60 109 136 153	1075 538 607 250
Rule	23(a)(1)	60 93	1076 855
	23(a)(2)	60	1076
	23(a)(3)	60 81 93 153	1076 1048 855 252
	23 (b)	60 93 109 139	1076 855 540 526-528
	23(c)	60 93 109	1076 855 540
	23 (d)	60	1076-1077

 $^{^6\}mathrm{Rule}$ 22 was restructured to add paragraphs (a), (b), (c), and (d) in 2019. See 153 T.C. 250.

		109 139	540 526-528
	23 (e)	60 81	1077 1048
	23(f)	60 93	1077 855
	23 (g)	81 109 139	1048 540 526-528
Rule	24	60	1078
	24(a)(1)	60 109	1078 543-544
	24(a)(2)	60 93	1078 858-859
	24(a)(3)	60 81 93 109	1078 1049 858-859 543-544
	24(a)(4)	60 93	1078 858-859
	24(a)(5)	136	610-611
	24 (b)	60 93	1078 858-859
	24(c)	60 81 93 109	1078 1049 858-859 543-544
	24 (d)	109	543-544
	24 (e) ⁷	60	1079

⁷Paragraphs (e), (f), and (g) were originally designated as paragraphs (d), (e), and (f), respectively. See 109 T.C. 543- (continued...)

		109	543-544
	24(f) ⁷	60 93 109 136	1079 858-859 543-544 610-611
	24 (g) ⁷	93 109	858-859 543-544
Rule	25 (a)	60 71 90 93	1080 1184 1357 861
	25(a)(1)	153	253
	25(a)(3)	109 120 130 153	546 521 393-394 253
	25 (b)	60 71 85 130	1080 1185 1125 393
	25(c)	60 81 109 130	1080-1081 1050 546 394
	25 (d)	71 93 109 153	1185 861 546 253
Rule	26 26(a) 26(b)	135 139 139	617 528-529 528-529

⁷(...continued) 544, 93 T.C. 858-859, 60 T.C. 1079.

		9	
Rule	27	130	395-401
Title	e IV		
Rule	30	60 93 120	1081 862 521
Rule	31 (a)	60	1081
	31 (b)	60	1081
	31(c)	60	1082
	31 (d)	60	1082
Rule	32	60	1082
	32(a)	60 81	1082 1050
	32 (b)	60	1082
	32(c)	60	1083
	32 (d)	71 93	1186 863
Rule	33(a)	60 139	1083 530
	33 (b)	60 85	1083 1126
Rule	34(a)	60 71	1084 1187
	34(a)(1)	87 93 153	1558-1559 867 257
	34(a)(2)	90 93	1358 867

		109 130 153	551 406 257
	34 (b)	60 71 79 93 109	1085 1187 1137 867 551
	34(b)(1)	71 93 130	1187 867 406-408
	34(b)(4)	109	551
	34(b)(7)	71 81 93	1187 1051 867
	34 (c)	71 90 93 109 130 153	1187 1358 867 551 408 257
	34 (d)	130	408
	34 (e) ⁸	77 130	1429 408
Rule	35	60	1086
Rule	36(a)	60	1086
	36(b)	60 93	1086-1087 868
	36(c)	60	1087
	36(d)	71 93	1187 868

 $^{^{8}\}mbox{Paragraph}$ (e) was originally designated as paragraph (d). See 130 T.C. 406-408, 77 T.C. 1429.

Rule	37	60	1088
	37 (b)	93	870
	37 (c)	81 134	1051 313
	37(e)	71 93	1188 870
Rule	38	60 71 90 93 153	1088 1188 1359 870 258
Rule	39	60	1088
Rule	40	60 71	1088 1189
Rule	41	60	1089
	41 (a)	60 93	1089 873
	41(b)	60	1090
	41(b)(2)	93	873
	41 (c)	60 93	1090 873
	41 (d)	60	1090
Title	e V		
Rule	50(a)	60 81 109	1091 1052 557-558
	50 (b)	60 134	1091 314

		136	612
	50(c)	60	1092
	50 (d)	60	1092
	50(e)	60 109	1092 557-558
	50(f) ⁹	109 130 134	557-558 414 314
Rule	51	60	1092
	51(a)	60	1092
	51 (b)	60	1093
Rule	52	60	1093
Rule	53	60	1093
Rule	54	60 81 93 130	1093 1052 876 416
Rule	55	93 120 130	876-877 534 416
Rule	56	93 130 139	879-882 419 534
Rule	57	93	886-891

 $^{^9\}mathrm{Paragraph}$ (f) was formerly designated as paragraph (g), and paragraph (f) as originally adopted was deleted. See 134 T.C. 314, 130 T.C. 414.

			-13-
		130 139	423 534
Rule	5810	79 93	1138 891
Title	e VI		
Rule	60 (a)	60 71	1094 1189
	60(a)(2)	93 109 153	893 567 259
	60 (b)	60	1094
	60 (c)	60 93	1094 893
	60 (d)	60 93	1095 893
Rule	61	60	1095
	61(a)	71 93 109 153	1190 894 568 260
Rule	62	60	1096
Rule	63 (a)	60	1096
	63 (b)	60	1096
	63 (c)	60	1096
	63 (d)	60	1096

 $^{^{10}\}mbox{Rule}$ 58 was originally designated as Rule 55. See 93 T.C. 891, 79 T.C. 1138-1139.

63(e)	60	1096
Title VII	60	1097
Rule 70(a)	60	1097
70(a)(1)	71 79 93 134	1191 1139 898 318-321
70(a)(2)	71 79 81 93 109 134 136	1191 1139 1053 898 572-573 318-321 616
70(a)(3)	71 93	1191 898
70 (b) 11	60 139	1098 539
70(b)(1)	85	1128-1129
70 (b) (2)	85	1128-1129
70(b)(3)	134	318-321
70 (c) ¹¹	60 93 139	1099 898 539
70 (d) ¹²	60	1099

 $^{^{11}\}mbox{Paragraphs}$ (b) and (c) were restructured in 2012. See 139 T.C. 539.

¹² Paragraphs (d), (e), (f), and (g) were formerly designated as paragraphs (c), (d), (e), and (f), respectively. See 60 T.C. 1097-1099, 85 T.C. 1128-1129, 139 T.C. 539. Paragraph (f) was originally designated as paragraph (e). See 85 T.C. 1128-1129, (continued...)

		71 79 93 134 139	1191-1192 1139 898 318-321 539
	70 (e) 12	85 93 139	1128-1129 898 539
	70(f) ¹²	60 85 139	1099 1128-1129 539
	70 (g) ¹²	139	539
Rule	71	60	1099-1100
	71 (a)	60 134 139	1099-1100 323-325 541
	71 (b)	60 93	1100 900-901
	71 (c)	60 71 93 109	1100 1192 900-901 574
	71 (d)	60	1101
	71(d)(1)	71 93	1193 900-901
	71(d)(2)	71 85 93 134	1193 1129 900-901 323-325
	71 (e)	60 93 134	1101 900-901 323-325

¹²(...continued) 60 T.C. 1099.

Rule	72	60	1102
	72 (a)	60 134	1102 327
	72 (b)	60 71 81 134	1102 1193 1054 327
Rule	73	60 134	1103 328
Rule	7413	71 79 81 134	1195 1139-1140 1055 335-337
	74(a)	136	623
	74(c)	153	267
	74(e)	139	549
Title	e VIII	60 136	1104 603
Rule	80	60	1104
	80 (a)	71 79 93 134	1196 1142 914 338
	80 (b)	93	914

 $^{^{13}} Former$ Rule 74 was deleted and replaced with new Rule 74, merging Rules 74, 75, and 76. See 134 T.C. 335-337. For former Rule 74, see 81 T.C. 1055, 79 T.C. 1139-1140, and 71 T.C. 1195; for former Rule 75, see 130 T.C. 436, 93 T.C. 907, 81 T.C. 1056, 79 T.C. 1141-1142; for former Rule 76, see 130 T.C. 440, 93 T.C. 910-913.

Rule	81 (a)	60 93 134	1104 922-923 347
	81 (b)	60 81	1105 1061-1062
	81(b)(1)	93 130 134	922-923 449 347
	81(b)(2)	71 93 130 134	1197 922-923 449 346-347
	81(c)	60 93	1106 922-923
	81 (d)	60 81	1106 1061-1062
	81(e)	60	1107
	81(e)(2)	71 81 93	1198 1061 922-923
	81(e)(3)	93	922-923
	81(f)	60	1108
	81(f)(2)	93	922-923
	81 (g)	60 93	1109 922-923
	81(g)(1)	71 81	1198 1061
	81(h)	60	1110
	81(h)(1)	93 134	922-923 347
	81(h)(2)	130	449
	81(h)(3)	81	1061

		93 134	922-923 347
	81(i)	60 93 134	1110 922-923 347
	81(j)	81 130	1061-1062 449
	81(j)(2)	93	922-923
	81(j)(3)	93	922-923
	81(j)(4)	93	922-923
	81(j)(5)	134	347
Rule	82	60 134	1111 347
Rule	83	60	1111
Rule	84	60	1112
	84(a)	60	1112
	84(b)	60	1112-1113
	84(c)	60	1113
	84 (d)	60 81	1113 1062
Rule	85 (a)	60	1113
	85(b)	60	1113
	85(c)	60	1114
	85 (d)	60	1114
	85(e)	60 134	1114 349

Title IX

Rule	90	60	1114-1115; see 1118
	90 (a)	60 71 109	1114-1115 1199 599
	90 (b)	60 109 130	1115 599 455
	90(c)	60	1115-1116
	90 (d)	85	1132
	90 (e) ¹⁴	60 85	1116 1132
	90 (f) ¹⁴	60 85	1116 1132
	90 (g) ¹⁴	60 85	1117 1132
	90(h)	85 109	1132 599
Rule	91	60	1117-1118
	91 (a)	60 136	1117-1118 627
	91 (b)	60 109	1118 603
	91 (c)	60	1118
	91 (d)	60	1119
	91(e)	60	1119

 $^{^{14}\}mbox{Paragraphs}$ (e), (f), and (g) were originally designated as paragraphs (d), (e), and (f), respectively. See 85 T.C. 1132, 60 T.C. 1116-1117.

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	91(f)	60		1120-1121
	91(f)(1)	71 134		1200 352
	91(f)(3)	109		603
Rule	92	71		1200
Title	e X			
Rule	100	60 71 79 93 134		1121 1201 1143 933 352
Rule	101	60		1122
Rule	102	60 71 79 93 134		1122 1201 1144 935 353
Rule	103	60 93 134		1123 936 354
Rule	104	134		356-358
	104(a)	60 71 79 93		1124 1203 1145 938
	104(b)	60 71 79 81 93		1124 1203 1145 1063 938

		2 1	
	104(c)	60 71 79 85 93	1124 1203 1145 1133 938
	104(d)	60 71 79 93	1125 1203 1145 938
	104(e)	134	356-358
Title	e XI		
Rule	110(a)	60	1125
	110(b)	60	1125
	110(c)	60 130	1125 464
	110(d)	60	1126
	110(e)	60	1126
Title	e XII		
Rule	120	60	1126
	120(a)	60	1126
	120 (b)	60	1126
Rule	121	60	1127
	121(a)	60 136 139	1127 629 551-552
	121(b)	60 71 81	1127 1204 1063

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		139	551-552
	121(c)	60	1127
	121 (d)	60 139	1128 551-552
	121(e)	60 139	1128 551-552
	121(f)	60 139	1129 551-552
Rule	122	60	1129
	122(a)	60 71 81 109	1129 1204 1064 611
	122 (b)	60	1129
Rule	123(a)	60	1129
	123 (b)	60	1130
	123(c)	60	1130
	123 (d)	60	1130
Rule	124	93 136	944-945 631
	124(b)(5)	109	613-614
Title	e XIII		
Rule	130(a)	60 136	1130 632
	130 (b)	60	1130

Rule	13115	109	615
	131(a)	60 81 93 130	1131 1064 947 469
	131 (b)	93	947
	131(c) ¹⁶	60 93	1131 947
Rule	132 ¹⁷	60	1131
Rule	13318	60 71 85	1132 1205 1134

Title XIV

Rule	140 (a) ¹⁹	60 81 93 120 130	1132 1065 948-949 588 471
	140 (b)	60 81	1132 1065

 $^{^{15}\}mathrm{Rule}$ 131 was originally designated as Rule 132. See 109 T.C. 597, 60 T.C. 1131.

¹⁶Paragraph (c) was originally designated as paragraph (b). See 93 T.C. 947, 60 T.C. 1131.

 $^{^{17} \}rm Rule~132$ was originally designated as Rule 133. See 109 T.C. 597, 60 T.C. 1131-1132.

 $^{^{18}\}mbox{Rule}$ 133 was originally designated as Rule 134. See 109 T.C. 597, 60 T.C. 1131-1132.

¹⁹Paragraph (a) is derived in part from paragraph (c) as originally adopted. See 81 T.C. 1065, 60 T.C. 1132.

		85 130	1134 471
	140(c) ²⁰	60 81 93	1133 1065 948-949
Rule	141(a)	60 71 93	1133 1206 950
	141 (b)	60	1133
Rule	142(a)	60 93 120	1133 951 590
	142(b)	60	1133
	142(c)	60 93	1134 951
	142 (d)	60	1134
	142(e)	60	1134
	142(f)	109 120	618 590
Rule	143(a)	60 79 93 153	1135 1146 954-955 270
	143 (b)	134	360-362
	143(c) ²¹	60	1135

 $^{^{20}\}mbox{Paragraph}$ (c) was originally designated as paragraph (d). See 81 T.C. 1065, 60 T.C. 1132-1133.

 $^{^{21}\}mbox{Paragraphs}$ (c), (d), (e), (f), and (g) were originally designated as paragraphs (b), (c), (d), (e), and (f), (continued...)

		134 139	360-362 554-555
	143 (d) ²¹	60 134	1135 360-362
	143 (e) ²¹	60 109 134	1136 621 360-362
	143(e)(2)	81 93	1066 954-955
	143(f) ²¹	60 81 93 134	1136 1066 954-955 360-362
	143 (g) ²¹	81 85 93 109 134 139	1066 1135-1136 954-955 621 360-362 554-555
Rule	144	60	1136
Rule	145	60	1137
	145(a)	71	1206
Rule	146	60	1137
Rule	147(a)	60 134	1137 364
	147 (b)	60 134	1137 364
	147(c)	60 93	1138 958

²¹(...continued) respectively. See 134 T.C. 360-362, 60 T.C. 1135.

	147 (d)	60 71 79 134	1138-1139 1207 1147 364
	147(d)(1)	93	958
	147(e)	60 93	1139 958
Rule	148(a)	60 71 109	1139 1208 624
	148(b)	60	1139
	148(c)	60	1139
Rule	149(a)	60	1139
	149(b)	60	1140
Rule	150(a)	60 109 136	1140 625 632-633
	150(b)	60 109	1140 625
Rule	151(a)	60 109 136	1140 627-628 634-635
	151(b)	60 71 85 136	1141 1208-1209 1136 634-635
	151(c)	60 109 134	1141 627-628 366
	151(d)	60 81	1141 1066

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	151(e)	60 109	1142 627-628
Rule	152	79	1148
	152(a)	93 120 130	962 599 482
	152 (b)	130	482
	152(c)	93 130	962 482
Title	e XV		
Rule	155	60	1143
	155(a)	79 93 130 136 139	1149 964 483-484 636 556
	155(b)	71 93 130 134 136 139	1209-1210 964 483-484 368 636 556
	155(c)	130	483-484
Rule	156	60	1143
Rule	157	93	965
Rule	160	60	1143
Rule	161	60 79	1144 1149

Rule	162	60	1144
Rule	163	60	1144
Title	e XVII	120	602-603
Rule	170 ²²	60 120	1145 604-605
Rule	171 ²³	60 71 81 120	1146 1211 1067 605
	171 (b)	136	637-639
Rule	172 ²⁴	60 120	1146 606
Rule	173 ²⁵	60 120	1147 607
	173(a)(1)	71 120	1211 607
	173(a)(2)	77 85 139	1429 1137 557

 $^{^{22}\}text{Rule}$ 170 is derived in part from Rule 171 as originally adopted. See 82 T.C. 1072, 79 T.C. 1150, 71 T.C. 1210, 60 T.C. 1145.

 $^{^{23}\}mbox{Rule}$ 171 was originally designated as Rule 172. See 120 T.C. 604-605, 81 T.C. 1067, 60 T.C. 1146.

 $^{^{24}\}mbox{Rule}$ 172 was originally designated as Rule 174. See 120 T.C. 605-606, 60 T.C. 1146.

 $^{^{25}\}mbox{Rule}$ 173 was originally designated as Rule 175. See 120 T.C. 606-607, 60 T.C. 1147.

	173(a)(3)	120	607
	173 (b)	71 128 130	1212 230-231 487-489 ²⁶
	173(c)	120	607
Rule	174 ²⁷	120	608
	174(a)	71 81 130	1213 1067 489
	174(c)	120	608
Rule	175 ²⁸	60 120 130 139	1148 608 490 521
Title	e XVIII		
Rule	180	60 71	1148 1213
Rule	181	60 71 134	1149 1214 368

 $^{^{26}\}mathrm{The}$ Note to the amendment of Rule 173(b), effective for small tax cases in which the petitions are filed after March 13, 2007, was originally published in T.C. Volume 128. It was included in T.C. Volume 130 as part of a substantial revision and republication of the Rules.

 $^{^{27}\}mbox{Rule}$ 174 was originally designated as Rule 177. See 120 T.C. 608, 60 T.C. 1148.

 $^{^{28}\}mbox{Rule}$ 175 was originally designated as Rule 179. See 120 T.C. 608, 60 T.C. 1148. Rule 175 is deleted. See 139 T.C. 521.

Rule 182 ²⁹	60 71 79 81 82 120 130	1150 1215 1151 1068-1069 1073 610-611 492-493
182(c)	120 130	610-611 492-493
182 (d) ³⁰	85 120 130	1138 610-611 492-493
182 (e)	125 130	347 492-493 ³¹
Rule 183 ³²	60 71 81 82 120 125 130	1150 1215 1069-1070 1074 611-612 343-347 494-497 ³³

²⁹Paragraph (a) of Rule 182 was originally designated as Rule 183. See 81 T.C. 1068, 60 T.C. 1150.

 $^{^{\}rm 30} Paragraph$ (d) was originally designated as paragraph (c). See 120 T.C. 610, 85 T.C. 1138.

 $^{^{31}}$ The Note to the amendment of Rule 182(e), effective September 20, 2005, was originally published in T.C. Volume 125. It was included in T.C. Volume 130 as part of a substantial revision and republication of the Rules.

 $^{^{\}rm 32}\text{Rule}$ 183 was originally designated as Rule 182. See 81 T.C. 1069, 60 T.C. 1150.

 $^{^{33}}$ The Note to the amendment of Rule 183, effective September 20, 2005, was originally published in T.C. Volume 125. It was included in T.C. Volume 130 as part of a substantial revision and republication of the Rules.

Title XIX

Rule	190	60 93	1151 974-975
Rule	191	60	1151
Rule	192	60 109	1151 639
Rule	193	87	1560
Title	e XX		
Rule	200(a)	60 93 130	1153 979 502
	200(a)(1)	71	1216
	200(a)(2)	81 82 109	1071 1074 642-643
	200(a)(3) ³⁴	60 71 81 93 109 130	1153 1216 1071 979 642-643 502
	200 (b) ³⁵	60 130	1153 502
	200(c)	60 93	1153 979

 $^{^{34}} Subparagraph$ (a) (3) is derived in part from former paragraph (d). See 130 T.C. 502, 109 T.C. 642-643, 93 T.C. 979, 60 T.C. 1153.

 $^{^{35}\}mbox{Paragraph}$ (b) includes information contained in former paragraph (e). See 130 T.C. 502, 60 T.C. 1153.

		130	502
	200 (d) ³⁶	60 130	1153 502
	200 (e) ³⁷	60 81 130 134	1153 1071 502 371-372
	200(f) ³⁷	60 130	1153 502
	200 (g) ³⁷	87 130 134	1561 502 372
Rule	201	60	1153
	201(a)	82	1075
Rule	202	60 125 130	1154 352 ³⁸ 504-505
	202(a)	81 82 130	1074 1075 504-505
	202 (b)	134	374-375

 $^{^{36}\}mbox{Paragraph}$ (d) is derived from former paragraph (f). See 130 T.C. 502, 60 T.C. 1153.

 $^{^{37}\}mbox{Paragraphs}$ (e), (f), and (g) were formerly designated as paragraphs (g), (h), and (i), respectively. See 130 T.C. 502, 87 T.C. 1561, 81 T.C. 1071, 60 T.C. 1153.

³⁸The Note to the amendments to Rule 202, effective September 20, 2005, was originally published in T.C. Volume 125. It was included in T.C. Volume 130 as part of a substantial revision and republication of the Rules.

202(c) ³⁹	81 130	1074 504-505
202(d)	134	374-375
202 (e) ⁴⁰	81 130	1074 504-505
202(f) ⁴¹	81 130	1074 504-505
202 (g) ⁴²	81 130	1074 504-505
202 (h) ⁴³	81 130	1074 504-505
202(i) ⁴⁴	81 130	1074 504-505
Title XXI	64 68	1177-1179 1031-1032

 $^{^{39}} Paragraph$ (c) was formerly designated as paragraph (b), which included information originally contained in paragraph (a). See 134 T.C. 374-375, 130 T.C. 505, 81 T.C. 1074.

 $^{^{40}}$ Paragraph (e) was formerly designated as paragraph (c), which was originally designated as paragraph (b). See 81 T.C. 1074, 130 T.C. 505, 134 T.C. 374-375.

 $^{^{41}} Paragraph$ (f) was formerly designated as paragraph (d), which was originally designated as paragraph (c). See 81 T.C. 1074, 130 T.C. 505, 134 T.C. 374-375.

 $^{^{42}}$ Paragraph (g) was formerly designated as paragraph (e), which was originally designated as subparagraph (b)(5). See 134 T.C. 374-375, 130 T.C. 505, 81 T.C. 1074.

 $^{^{43}}$ Paragraph (h) was formerly designated as paragraph (f), which was derived from former paragraph (d). See 134 T.C. 374-375, 130 T.C. 504-505, 81 T.C. 1074.

 $^{^{44}} Paragraph$ (i) was formerly designated as paragraph (g), which was originally designated as paragraph (e). See 134 T.C. 374-375, 130 T.C. 505, 81 T.C. 1074.

		85 93 120	1139 982-983 619-620
Rule	210(a)	68 71 120	1031-1032 1218 624-625
	210 (b)	71 120	1218 624-625
	210(c)	68 71 120	1035 1218 624-625
	210 (d)	68	1035
Rule	211	68	1040-1041
	211 (b)	71 109 120	1223 654-655 632-633
	211(c)	71 81 109	1223 1075 654-655
	211 (d)	120 130	632-633 516
	211(e) ⁴⁵	71 81 109 120	1223 1075 654-655 632-633
	211(f) 211(g) ⁴⁵	120 130 71 79	632-633 516 1223 1151

⁴⁵Paragraphs (e), (g), and (h) were formerly designated as paragraphs (d), (e), and (f), respectively. See 120 T.C. 632-633. Paragraphs (d), (e), and (f) were originally designated as paragraphs (e), (f), and (g), respectively. See 93 T.C. 982-983, 990-992, 71 T.C. 1222-1223.

		81 109	1075 654-655
	211 (h) ⁴⁵	71	1223
Rule	212	68 71 81 130	1041 1224 1076 517
Rule	213(a)(2)	68 71	1042-1043 1225
	213(a)(3)	68	1043
	213 (b)	68	1044-1045
	213(b)(2)	71	1226
Rule	215	68	1046-1047
	215(a)	130 134	522 378
	215 (b)	120 130 134	638 522 378
	215(c) ⁴⁶	71	1226
Rule	217(a)	68 71 120	1048 1227 641
	217 (b) (1)	68 71 109 120	1049 1228 662 641

⁴⁶Paragraph (c) was formerly designated as paragraph (b). See 120 T.C. 641. Former paragraph (b) was originally designated as paragraph (c). See 93 T.C. 982-983, 995-996.

	217(c)	120	641
	217(c)(1)	68	1050
	217(c)(2)	68	1051
Rule	218(a)	71	1228
	218 (b)	71 81	1228 1076
Title	e XXII		
Rule	220(a)	68 71	1052 1229
Rule	221 (b)	81 93 130	1077 1005 529
	221(d)(6)	68	1055
	221(d)(7)	93	1005
Rule	222	81 130	1077 530
Rule	226	93	1008
Rule	227 (c)	93	1009
Rule	228	68	1060
Rule	229	68	1061

Rule 229A ⁴⁷	71 79	1229 1151
229A(b)	81	1077
Title XXIII	79 93	1153 1010-1011
Rule 230	79	1153
230(a)	93	1013
230 (b)	93 109 120 153	1013 673-674 652-653 271
Rule 231	79	1155
231(a)	93 120	1015-1016 655-656
231 (b)	109 120 139	676 655-656 560
231(d)	120 139	655-656 560
231(e)	120	655-656
Rule 232	79 93	1158-1159 1020-1021
232(a)	109	680
232 (b) 48	109	680

 $^{^{47}\}text{Rule}$ 229A was originally designated as Rule 230. See 79 T.C. 1151, 68 T.C. 1061.

⁴⁸ Paragraphs (b) and (c) were originally designated as paragraphs (c) and (b), respectively. See 109 T.C. 662, 71 T.C. (continued...)

			50	
		120		660
	232 (c) ⁴⁸	109		680
	232(d)	81 109 120 139		1079 680 660 564
	232 (e)	109 120		680 660
Rule	233	79 93 109 153		1160 1021-1022 681 271
Title	e XXIV	82 90		1077 1359-1361
Rule	240	82 153		1077-1078 273
	240(a)	153		273
	240(b)(4)	90		1363
	240 (d)	90		1363
Rule	241	82		1082
	241(a)	90 109 130 139		1367-1368 687-688 547 568-570
	241(c)	90 93		1367-1368 1027
	241 (d)	90		1367-1368

^{48 (...}continued) 1158-1159.

		93	1027
	241(e)	90 93	1367-1368 1027
	241(f)	90 139	1367-1368 568-570
	241 (g)	90	1367-1368
	241 (h)	109	687-688
Rule	242	82 130	1082-1083 547
Rule	243	82	1083
Rule	244	90	1368
Rule	245 ⁴⁹	82	1084-1085
	245(a)	90	1369-1370
	245 (b)	90	1369-1370
	245 (d)	90	1369-1370
	245(e)	90	1369-1370
Rule	246 ⁵⁰	82 90	1085 1371
	246(c)	109	690

 $^{^{49}\}mathrm{Rule}$ 245 was originally designated as Rule 244. See 90 T.C. 1368-1369, 82 T.C. 1083-1085.

 $^{^{50}\}mbox{Rule}$ 246 was originally designated as Rule 245. See 90 T.C. 1370-1371, 82 T.C. 1085.

Rule 247 ⁵¹	82 90	1086 1372
Rule 248	90	1374-1376
Rule 249 ⁵²	82 90	1087 1377-1378
Rule 250	90	1378-1379
Rule 251	90	1380
Title XXIV.A	153	275
Rule 255.1	153	275
Rule 255.2	153	277
Rule 255.3	153	278
Rule 255.4	153	278
Rule 255.5	153	278
Rule 255.6	153	279
Rule 255.7	153	279
Title XXV	93	1034
Rule 260	93	1037-1038
260 (b)	130	555

 $^{^{51}\}mbox{Rule}$ 247 was originally designated as Rule 246. See 90 T.C. 1371-1372, 82 T.C. 1085-1086.

 $^{^{52} \}text{Rule}$ 249 was originally designated as Rule 247. See 90 T.C. 1376-1377, 82 T.C. 1086-1087.

	260 (e)	109	696
Rule	261	93 120	1040-1041 677-678
	261(a)	120	677-678
	261 (b)	120 130	677-678 558
	261(c)	120	677-678
	261(e)	109 120	698 677-678
Rule	262	93	1043-1044
	262(a)	109	700
	262 (b)	109 130	700 560-561
	262(c)	109	700
	262(e)	109	700
Title	e XXVI	93	1045-1046
Rule	270	93	1047
	270 (b)	120	681
	270(c)	120 130	681 562
	270 (d)	109	701
Rule	271	93	1049
	271 (b)	109	703
	271(c)	130 139	563 571

Rule	272	93	1051-1052
	272(a)	109	704
Rule	273	93	1052
Rule	274	93 139	1052 571-572
Title	≥ XXVII	109	705-706
Rule	280	109	706
	280 (b)	120 153	685 280
Rule	281	109	708
	281 (b)	130 153	567 282
	281(c) ⁵³	139 153	573 282
	281 (d)	153	282
Rule	282	109 130	708 567
Rule	283	109	709
Rule	284	109	709
Title	e XXVIII	120	687-688

⁵³New paragraph (c) was added to Rule 281 and former paragraph (c) was redesignated paragraph (d). See 153 T.C. 282.

Rule 2	290	120	689
Rule 2	291	120	691
:	291 (b)	130	570
Rule 2	292	120 130	691 570
Rule 2	293	120	692
Rule 2	294	120	692
Title	XXIX	120	692-693
Rule 3	300	120	695
Rule	301 301(a)	120 139	698 576
:	301(c)	130	575
Rule :	302	120 130	698 575
Rule 3	303	120	699
Rule 3	304	120	699
Rule 3	305	120	700
Title	xxx	120	701-702
Rule :	310	120	703

	310(a)	153	283
Rule	311	120	704
Rule	312	120 130	705 578
Rule	313	120	705
Rule	314	120	705-706
Rule	315	120	706
Rule	316	120	707
Title	e XXXI	120	708-709
Rule	320	120	710
Rule Rule		120	710 711-712
	321 321 (b)	120	711-712
Rule	321 321 (b) 322	120 130 120	711-712 581 712
Rule Rule	321 321 (b) 322 323	120 130 120 130	711-712 581 712 581
Rule Rule	321 321 (b) 322 323 324	120 130 120 130	711-712 581 712 581 713

Title XXXII	120	715-716
Rule 330	120	717
Rule 331	120	718-719
331 (b)	130	584
Rule 332	120 130	719 584
Rule 333	120	720
Rule 334	120	720
Title XXXIII	130	585
Rule 340	130	586-587
Rule 341	130	588
Rule 342	130	588
Rule 343	130	589
Rule 344	130	589
Rule 345	139	577-580
Title XXXIV	153	284
Rule 350	153	284
Rule 351	153	285
Rule 352	153	286
Rule 353	153	286
Rule 354	153	286

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	134	379-380
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