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Woodbury, Estate of v. C.I.R., T.C. Memo. 2014-66, T.C.M. (RIA) ¶ 2014-066, 107 T.C.M. (CCH) 1350 (2014)—§ 10:64

Wood's Estate v. Commissioner of Internal Revenue, 54 T.C. 1180, 1970 WL 2403 (1970)—§§ 3:1, 7:36

Wooley v. U.S., 736 F. Supp. 1506, 90-1 U.S. Tax Cas. (CCH) ¶ 60013, 66 A.F.T.R.2d 90-6031 (S.D. Ind. 1990)—§§ 2:103, 16:17

Worcester County Trust Co v. C I R, 134 F.2d 578, 43-1 U.S. Tax Cas. (CCH) ¶ 10029, 30 A.F.T.R. (P-H) ¶ 1165 (C.C.A. 1st Cir. 1943)—§ 3:180

Wu, In re Estate of, 24 Misc. 3d 668, 877 N.Y.S.2d 886 (Sur. Ct. 2009)—§ 10:15

Wurts, Estate of v. C.I.R., T.C. Memo. 1960-102, T.C.M. (P-H) ¶ 60102, 19 T.C.M. (CCH) 544, 1960 WL 860 (T.C. 1960)—§§ 2:215, 2:224

Wycoff, Estate of v. C.I.R., 506 F.2d 1144, 74-2 U.S. Tax Cas. (CCH) ¶ 13037, 35 A.F.T.R.2d 75-1557 (10th Cir. 1974)—§§ 6:153, 6:156

Wyly's Estate v. C. I. R., 610 F.2d 1282, 80-1 U.S. Tax Cas. (CCH) ¶ 13332, 45 A.F.T.R.2d 80-1737 (5th Cir. 1980)—§§ 2:121, 2:150, 2:176

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Yawkey, Estate of v. C.I.R., 12 T.C. 1164, 1949 WL 245 (T.C. 1949)—§ 2:193

Yerkes v. C.I.R., 47 B.T.A. 431, 1942 WL 120 (B.T.A. 1942)—§ 14:121

Youle, Estate of v. C.I.R., T.C. Memo. 1989-138, T.C.M. (P-H) ¶ 89138, 56 T.C.M. (CCH) 1594, 1989 WL 28342 (1989)—§ 22:7

Young v. U.S., 559 F.2d 695, 77-1 U.S. Tax Cas. (CCH) ¶ 13177, 39 A.F.T.R.2d 77-1633 (D.C. Cir. 1977)—§ 6:52

Young, Estate of v. C.I.R., 110 T.C. 297, Tax Ct. Rep. (CCH) 52691, Tax Ct. Rep. Dec. (RIA) 110.24, 1998 WL 235975 (1998)—§§ 2:75, 2:82, 3:306, 22:8, 22:9

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Zahn's Estate, In re, 300 N.Y. 1, 87 N.E.2d 558, 38 A.F.T.R. (P-H) ¶ 734, 10 A.L.R.2d 652 (1949)—§ 10:15

Zahn's Estate, In re, 273 A.D. 476, 77 N.Y.S.2d 904 (1st Dep't 1948)—§ 10:15

Zanuck v. C.I.R., 149 F.2d 714, 45-2 U.S. Tax Cas. (CCH) ¶ 10208, 33 A.F.T.R. (P-H) ¶ 1448, 160 A.L.R. 661 (C.C.A. 9th Cir. 1945)—§ 17:1

Zeman, Estate of C. I. R., T.C. Memo. 1958-68, T.C.M. (P-H) ¶ 58068, 17 T.C.M. (CCH) 336, 1958 WL 873 (T.C. 1958)—§ 6:24

Zien v. U.S., 73-2 U.S. Tax Cas. (CCH) ¶ 12964, 33 A.F.T.R.2d 74-1393, 1973 WL 666 (E.D. Wis. 1973)—§ 2:220

Zietz, Estate of v. C. I. R., 34 T.C. 351, 1960 WL 1207 (T.C. 1960)—§ 8:22

Zlotowski, Estate of v. C.I.R., T.C. Memo. 2007-203, T.C.M. (RIA) ¶ 2007-203, 94 T.C.M. (CCH) 101 (2007)—§ 9:24