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74-2083

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**United States Court of Appeals
FOR THE SECOND CIRCUIT**

Docket No. 74-2083

MEDWIN BENJAMIN,

Petitioner-Appellant,

—against—

COMMISSIONER OF INTERNAL REVENUE,

Appellee-Respondent.

**ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BRIEF OF PETITIONER-APPELLANT

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