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Either the taxpayer or the IRS may initiate legal proceedings in the Federal court system. Page 150 5-2. The Federal court system consists of three trial courts; the Tax Court, the District Courts and the U.S. Court of Federal Claims; and two levels of appellate courts; the U.S. Court of Appeals and the U.S. Supreme Court. Page 150 - 151 5-3. No.

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Federal Tax Research, Eighth Edition Page 5-2 nineteen judges. Each judge is appointed to a fifteen-year term by the President, with the advice and confirmation of the Senate. Periodically, the Chief Judge of the Court designates additional temporary Tax Court judges to hear cases. See page 154 of the text. 5-8. No.