

SAMUEL ALBA (0031)
RODNEY R. PARKER (4110)
RICHARD A. VAN WAGONER (4690)
JAMES S. JUDD (14693)
SNOW CHRISTENSEN & MARTINEAU
10 Exchange Place, Eleventh Floor
Post Office Box 45000
Salt Lake City, Utah 84145-5000
Telephone: (801) 521-9000
Facsimile: (801) 363-0400
Email: sa@scmlaw.com
Email: rrp@scmlaw.com
Email: rav@scmlaw.com
Email: jsj@scmlaw.com

Attorneys for RaPower-3, LLC, International Automated Systems, Inc., LTB1, LLC, and Neldon Johnson

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

RAPOWER-3, LLC, INTERNATIONAL
AUTOMATED SYSTEMS, INC., LTB1,
LLC, R. GREGORY SHEPARD, NELDON
JOHNSON, and ROGER FREEBORN,

Defendants.

No. 2:15-cv-00828-DN-BCW

REQUEST FOR ORAL ARGUMENT

Defendants RaPower-3, LLC, International Automated Systems, Inc., LTB1, LLC, and Neldon Johnson, pursuant to local Rule 7-1, hereby request oral argument on the Motion for Relief From Standard Protective Order and DUCIVR-26-2 (the “Motion”).

The Motion contains peculiar circumstances due to the United States being a party and its desire to disclose protected information to other divisions of the government. Oral argument will assist the Court in making an appropriate determination.

WHEREFORE, Defendants respectfully request oral argument on the Motion.

DATED: May 13, 2016.

SNOW, CHRISTENSEN & MARTINEAU

By: /s/ James S. Judd
James S. Judd
*Attorneys for RaPower-3, LLC,
International Automated Systems, Inc.,
LTB1, LLC, and Neldon Johnson*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 13, 2016, the foregoing **REQUEST FOR ORAL ARGUMENT** was electronically filed with the Clerk of the Court through the CM/ECF system, which sent notice of the electronic filing to the following:

Erin Healy Gallagher
Christopher R. Moran
US Department of Justice
Tax Division
erin.healygallagher@usdoj.gov
christopher.r.moran@usdoj.gov

Erin R. Hines
US Department of Justice
Central Civil Trial Section
erin.r.hines@usdoj.gov

John K. Mangum
US Attorney's Office
john.mangum@usdoj.gov
Attorneys for Plaintiff U.S.A.

Donald S. Reay
Miller Reay & Associates
donald@reaylaw.com
*Attorneys for R. Gregory Shepard
and Roger Freeborn*

/s/ Michelle Rizzuto
Legal Assistant