

JUSTIN D. HEIDEMAN (USB No. 8897)

**HEIDEMAN & ASSOCIATES**

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*Attorney for RAPower-3, LLC, International Automated Systems, Inc., LTB1 and Neldon Johnson*

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**IN THE UNITED STATES DISTRICT COURT IN AND FOR  
THE DISTRICT OF UTAH, CENTRAL DIVISION**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAPOWER-3, LLC, INTERNATIONAL  
AUTOMATED SYSTEMS, INC., et al.,

Defendants.

**NOTICE OF SUBSTITUION OF  
COUNSEL**

Case No. 2:15-CV-0828 DN

Judge: Honorable David Nuffer

Magistrate Judge Brooke Wells

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NOTICE IS HEREBY GIVEN pursuant to DUCIV R 83-1.4(d) that Justin D. Heideman (USB No. 8897), and the law firm Heideman and Associates are substituted as counsel of record for RaPower-3, LLC, and International Automated Systems, Inc., LTB1, and Neldon Johnson, (“Defendants”) in place of Samuel Alba (USB No. 0031), and Richard A. Van Wagoner (USB No. 4690), and James S. Judd (USB No. 14693) and the law firm Snow Christensen & Martineau.

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Substituted counsel for Defendants is aware of and will comply with all pending deadlines in this matter. Presently, there is only a request for oral argument pending (Doc 39) regarding *Motion for Relief from Standard Protective Order and DUCivR 26-2* filed by Plaintiff USA. No hearing has yet been noticed up on the matter.

DATED and SIGNED May 17, 2016.

**HEIDEMAN & ASSOCIATES**

/s/ Justin D. Heideman

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

DATED and SIGNED May 17, 2016.

**SNOW CHRISTENSEN & MARTINEAU**

/s/ Samuel Alba

Former Attorney for Defendants RaPower-3, LLC, International Automated Systems, Inc., LTB1, and Neldon Johnson

**CERTIFICATE OF SERVICE**

On this 18<sup>th</sup> day of May 2016, I hereby certify a true and correct copy of the forgoing **NOTICE OF SUBSTITUTION OF COUNSEL** was served on the following:

<b>Party/Attorney</b>	<b>Method</b>
<p><i>Former Attorneys for Defendants</i></p> <p>James S. Judd  Richard A. Van Wagoner  Rodney R. Parker  Samuel Alba  Snow Christensen &amp; Martineau  10 Exchange Place 11<sup>th</sup> FL  P.O. Box 45000  Salt Lake City, Utah 84145  Tele: (801) 521-9000  Email: <a href="mailto:jsj@scmlaw.com">jsj@scmlaw.com</a>  <a href="mailto:rvanwagoner@scmlaw.com">rvanwagoner@scmlaw.com</a>  <a href="mailto:rparker@scmlaw.com">rparker@scmlaw.com</a>  <a href="mailto:sa@scmlaw.com">sa@scmlaw.com</a></p>	<p>Hand Delivery  U.S. Mail, postage prepaid  Overnight Mail  Fax Transmission  <input checked="" type="checkbox"/> Electronic Filing Notice</p>
<p><i>Attorney for Defendants</i></p> <p>R. Gregory Shepard  Roger Freeborn</p> <p>Donald S. Reay  Reay Law PLLC  43 W 9000 S Ste B  Sandy, Utah 84070  Tele: (801) 999-8529  Email: <a href="mailto:donald@reaylaw.com">donald@reaylaw.com</a></p>	<p>Hand Delivery  U.S. Mail, postage prepaid  Overnight Mail  Fax Transmission  <input checked="" type="checkbox"/> Electronic Filing Notice</p>
<p><i>Pro Hac Vice Attorney for Plaintiff</i></p> <p>Erin Healy Gallagher  US Department of Justice (TAX)</p>	<p>Hand Delivery  U.S. Mail, postage prepaid</p>

<p>Tax Division  P.O. Box 7238  Washington, DC 20044  Phone: (202) 353-2452  Email: <a href="mailto:erin.healygallagher@usdoj.gov">erin.healygallagher@usdoj.gov</a></p>	<p>Overnight Mail  Fax Transmission  <input checked="" type="checkbox"/> Electronic Filing Notice</p>
<p><i>Pro Hac Vice Attorney for Plaintiff</i></p> <p>Erin R. Hines  US Department Justice  Central Civil Trial Section RM 8921  555 4<sup>th</sup> St NW  Washington, DC 20001  Tele: (202) 514-6619  Email: <a href="mailto:erin.r.hines@usdoj.gov">erin.r.hines@usdoj.gov</a></p>	<p>Hand Delivery  U.S. Mail, postage prepaid  Overnight Mail  Fax Transmission  <input checked="" type="checkbox"/> Electronic Filing Notice</p>
<p><i>Attorney for Plaintiff</i></p> <p>John K. Mangum  US Attorney's Office (UT)  Tele: (801) 325-3216  Email: <a href="mailto:john.mangum@usdoj.gov">john.mangum@usdoj.gov</a></p>	<p>Hand Delivery  U.S. Mail, postage prepaid  Overnight Mail  Fax Transmission  <input checked="" type="checkbox"/> Electronic Filing Notice</p>
<p><i>Pro Hac Vice Attorney for Plaintiff</i></p> <p>Christopher R. Moran  US Department of Justice (TAX)  Tax Division  PO Box 7238  Washington, DC 20044  Tele: (202) 307-0234  Email: <a href="mailto:christopher.r.moran@usdoj.gov">christopher.r.moran@usdoj.gov</a></p>	<p>Hand Delivery  U.S. Mail, postage prepaid  Overnight Mail  Fax Transmission  <input checked="" type="checkbox"/> Electronic Filing Notice</p>

**HEIDEMAN & ASSOCIATES**

*/s/ Wendy Poulsen*

Wendy Poulsen Legal Assistant