

Denver C. Snuffer, Jr. (#3032) denversnuffer@gmail.com

Steven R. Paul (#7423) spaul@nsdplaw.com

Daniel B. Garriott (#9444) dbgariott@msn.com

Joshua D. Egan (15593) Joshua.egan@me.com

NELSON, SNUFFER, DAHLE & POULSEN

10885 South State Street

Sandy, Utah 84070

Telephone: (801) 576-1400

Facsimile: (801) 576-1960

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

IN THE UNITED STATES DISTRICT COURT FOR THE
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.

**DEFENDANTS' JOINDER IN TODD
ANDERSON'S MEMORANDUM IN
OPPOSITION TO UNITED STATES'
RENEWED MOTION TO COMPEL
TODD ANDERSON TO PRODUCE
DOCUMENTS**

Civil No. 2:15-cv-00828-DN-EJF

Judge David Nuffer

Magistrate Judge Evelyn J. Furse

COME NOW, Defendants Rapower-3, LLC, International Automated Systems, Inc., and Neldon Johnson, (hereinafter "Defendants") and hereby join in the arguments made by Todd Anderson in opposition to United States' Renewed Motion to Compel Todd Anderson to Produce Documents. The United States' Motion should be denied.

DATED this 31st day of May, 2017.

NELSON, SNUFFER, DAHLE & POULSEN, P.C.

/s/Denver C. Snuffer, Jr..
*Attorneys for Defendants RAPower-3, LLC,
International Automated Systems, Inc., LTB1, and
Neldon Johnson*

CERTIFICATE OF SERVICE

On this 31st day of May, 2016, I hereby certify that a true and correct copy of the foregoing **DEFENDANTS' JOINDER IN TODD ANDERSON'S MEMORANDUM IN OPPOSITION TO UNITED STATES' RENEWED MOTION TO COMPEL TODD ANDERSON TO PRODUCE DOCUMENTS** was served on the following by the method identified:

Party/Attorney	Method
Donald S. Reay Reay Law PLLC 43 W. 9000 S., Ste. B Sandy, Utah 84070 Tel. (801) 999-8529	☐ Hand Delivery ☐ U.S. Mail ☐ Overnight Mail ☐ Email: donald@reaylaw.com ☒ Electronic Filing Notice
John K. Mangum US Attorney's Office (UT) Tel. (801) 325-3216	☐ Hand Delivery ☐ U.S. Mail ☐ Overnight Mail ☐ Email: john.mangum@usdoj.gov ☒ Electronic Filing Notice
Erin Healy Gallagher Christopher R. Moran US Department of Justice (TAX) P.O. Box 7238 Washington, DC 20044 Tel. (202) 353-2452	☐ Hand Delivery ☐ U.S. Mail ☐ Overnight Mail ☐ Email: erin.healygallagher@usdoj.gov christopher.r.moran@usdoj.gov ☒ Electronic Filing Notice
Erin R. Hines US Department of Justice Central Civil Trial Section RM 8921 555 4 th St NW Washington, DC 20001 Tel. (202) 514-6619	☐ Hand Delivery ☐ U.S. Mail ☐ Overnight Mail ☐ Email: erin.r.hines@usdoj.gov ☒ Electronic Filing Notice

/s/Denver C. Snuffer, Jr.
Attorneys for Defendants