



U.S. Department of Justice

Tax Division

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DJ 5-77-4466
CMN 2014101376

August 16, 2017

VIA EMAIL

Denver Snuffer
Steven Paul
NELSON SNUFFER DAHLE & POULSEN
10885 South State Street
Sandy, Utah 84070

Re: *United States v. RaPower-3, LLC, et al.*
Case No. 2:15-cv-00828-DN-BCW

Dear Counsel:

Defendants made (or attempted to make) blanket and inappropriate designations of wide swaths of documents and other information in this case. This was improper under the terms of the Protective Order. (ECF Doc. 116 ¶ 3(a), (b), (c), (g).) We have parsed through the tens of thousands of pages Defendants produced and the other information at issue to evaluate the merits of Defendants' designations (and attempted designations). I write to challenge the designations (and any attempted designations) Defendants made to certain documents and information in this case.

As an initial matter, certain attempts by Defendants to invoke the Protective Order during depositions and the April 4, 2017 site visit failed to actually designate information as PROTECTED INFORMATION under its terms. The Protective Order requires a party to "designate only that part of a document or deposition that is CONFIDENTIAL INFORMATION or CONFIDENTIAL INFORMATION – ATTORNEYS EYES ONLY, rather than the entire document or deposition." (ECF Doc. 116 ¶¶ 3(g); *id.* ¶ 3(d); *see also id.* ¶ 2(c) (allowing a party to designate "batches" of materials as PROTECTED INFORMATION when making those materials available for inspection, but requiring the party to make specific designations on particular documents when producing them).) Therefore, to the extent Defendants may have attempted to designate all some of the following, those attempts failed because they did not follow the Protective Order's procedures: Deposition of Neldon Johnson, June 28, 2017; Deposition of Frank Lunn, August 1, 2016; Deposition of Brian Zeleznik, August 2, 2016; Deposition of Preston Olsen, August 10, 2016; and the site visit, April 4, 2017. As a result, none of the information disclosed during these events is PROTECTED INFORMATION. We will not treat it as PROTECTED INFORMATION going forward.

**Plaintiff
Exhibit**

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Further, the information disclosed during those events and documents Defendants produced (identified on the attached list) is not PROTECTED INFORMATION because it does not meet the definition of PROTECTED INFORMATION. PROTECTED INFORMATION means “confidential or proprietary technical, scientific, financial, business, health, or medical information which would be protected by Fed. R. Civ. P. 26(c), and which is designated either CONFIDENTIAL INFORMATION – ATTORNEYS EYES ONLY or CONFIDENTIAL INFORMATION by the producing party.” (ECF Doc. 116 ¶ 2(a).) Information is *not* PROTECTED INFORMATION if it falls into one or more of three categories: “(1) the information in question has become available to the public through no violation of this Order; or (2) the information was known to any receiving party prior to its receipt from the producing party; or (3) the information was received by any receiving party without restrictions on disclosure from a third party having the right to make such a disclosure.” (*Id.* ¶ 2(a).) The documents and information produced by Defendants and designated under its terms is not the kind of information that Fed. R. Civ. P. 26(c) protects. And even if it were, much if not all of the information designated by Defendants fits into one of the three carve-out categories.

For example, information about Defendants’ purported solar energy technology is not PROTECTED INFORMATION because it is not a trade secret. Under Utah law, a trade secret is “information . . . that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” Utah Code Ann. § 13-24-2(4). Defendants do not keep information about their purported solar energy technology secret. Instead, they make it public knowledge and encourage their customers to spread information about their technology. (*See generally* ECF Doc. 85 at 8-10.) Further, Defendants do not require customers to keep their own transactional information confidential and many customers have produced such information without confidentiality designations. (*E.g., id.* at 10-12; Lunn_F&L-00498 through Lunn_F&L-00916; Aulds_R&M-00001 through Aulds_R&M-00211.) Defendants’ bank records have been produced by the banks themselves without confidentiality designations. (*E.g.* WF-000001 through WF-013635.)

Withdrawing Defendants’ improper designations on the listed documents is particularly appropriate as this case moves toward summary judgment and trial preparation. There is a “strong presumption in favor of public access,” *Mann v. Boatright*, 477 F.3d 1140, 1149 (10th Cir. 2007), to the documents a court uses “to determine litigants’ substantive legal rights.” *Colony Ins. Co. v. Burke*, 698 F.3d 1222, 1242 (10th Cir. 2012). *Accord United States v. Pickard*, 733 F.3d 1297, 1302 (10th Cir. 2013); *PHL Variable Ins. Co. v. Sheldon Hathaway Family Ins. Tr.*, No. 2:10-CV-0067, 2012 WL 12888387, at *3 (D. Utah Dec. 6, 2012); DUCivR 5.2(a) (noting the presumption that the records of the District of Utah shall be “open to the public”). To

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the extent the United States uses any document on the list attached in support of a public filing that will or may decide this case, such document should be available to the public.

Sincerely,

/s/ Erin Healy Gallagher

ERIN HEALY GALLAGHER

Trial Attorney

Civil Trial Section, Central Region

CC: Donald Reay
Daniel B. Garriott
Joshua Egan

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 000074	Ra3 000204	
Ra3 000081	Ra3 000081	
Ra3 000104	Ra3 000104	
Ra3 000134	Ra3 000134	
Ra3 000191	Ra3 000191	
Ra3 000192	Ra3 000192	
Ra3 000198	Ra3 000198	
Ra3 000199	Ra3 000199	
Ra3 000200	Ra3 000200	
Ra3 000201	Ra3 000201	
Ra3 000202	Ra3 000202	
Ra3 000203	Ra3 000203	
Ra3 000204	Ra3 000204	
Ra3 000206	Ra3 000360	
Ra3 000280	Ra3 000280	
Ra3 000372	Ra3 000373	
Ra3 000391	Ra3 000391	
Ra3 000400	Ra3 000400	
Ra3 000401	Ra3 000405	
Ra3 000424	Ra3 000426	
Ra3 000427	Ra3 000431	
Ra3 000432	Ra3 000432	
Ra3 000433	Ra3 000434	
Ra3 000435	Ra3 000441	
Ra3 000449	Ra3 000450	
Ra3 000451	Ra3 000451	
Ra3 000452	Ra3 000458	
Ra3 000466	Ra3 000468	
Ra3 000469	Ra3 000492	
Ra3 000522	Ra3 000527	
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Ra3 000537	Ra3 000544	
Ra3 000545	Ra3 000545	
Ra3 000546	Ra3 000548	
Ra3 000549	Ra3 000549	
Ra3 000550	Ra3 000550	
Ra3 000551	Ra3 000557	463
Ra3 000558	Ra3 000564	
Ra3 000565	Ra3 000566	526
Ra3 000567	Ra3 000573	
Ra3 000574	Ra3 000576	
Ra3 000579	Ra3 000583	
Ra3 000584	Ra3 000590	
Ra3 000591	Ra3 000598	

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Ra3 000606	Ra3 000606	
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Ra3 000608	Ra3 000608	527
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Ra3 000613	Ra3 000619	
Ra3 000620	Ra3 000626	
Ra3 000627	Ra3 000633	
Ra3 000634	Ra3 000640	
Ra3 000641	Ra3 000649	
Ra3 000650	Ra3 000657	
Ra3 000658	Ra3 000665	
Ra3 000669	Ra3 000678	
Ra3 000679	Ra3 000679	
Ra3 000680	Ra3 000688	528
Ra3 000689	Ra3 000695	
Ra3 000696	Ra3 000714	
Ra3 000715	Ra3 000715	
Ra3 000716	Ra3 000716	
Ra3 000717	Ra3 000723	462
Ra3 000731	Ra3 000737	464
Ra3 000738	Ra3 000738	465
Ra3 000739	Ra3 000739	
Ra3 000742	Ra3 000743	
Ra3 000744	Ra3 000767	
Ra3 000768	Ra3 000784	529
Ra3 000884	Ra3 000884	
Ra3 000885	Ra3 000887	
Ra3 000890	Ra3 000890	
Ra3 000891	Ra3 000892	
Ra3 000895	Ra3 000895	
Ra3 000896	Ra3 000897	
Ra3 000901	Ra3 000905	
Ra3 000906	Ra3 000906	
Ra3 000933	Ra3 000933	
Ra3 000934	Ra3 000936	
Ra3 000945	Ra3 000948	
Ra3 000955	Ra3 000955	
Ra3 000958	Ra3 000958	
Ra3 000964	Ra3 000967	
Ra3 000968	Ra3 000968	
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Ra3 000982	Ra3 000982	
Ra3 000992	Ra3 000992	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 000993	Ra3 000993	
Ra3 000994	Ra3 000997	
Ra3 001001	Ra3 001001	
Ra3 001004	Ra3 001006	
Ra3 001009	Ra3 001009	
Ra3 001012	Ra3 001012	
Ra3 001015	Ra3 001015	
Ra3 001019	Ra3 001020	
Ra3 001023	Ra3 001023	
Ra3 001027	Ra3 001027	
Ra3 001029	Ra3 001030	
Ra3 001032	Ra3 001032	
Ra3 001041	Ra3 001041	
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Ra3 001062	Ra3 001065	
Ra3 001071	Ra3 001071	
Ra3 001077	Ra3 001077	
Ra3 001078	Ra3 001078	
Ra3 001080	Ra3 001080	
Ra3 001083	Ra3 001083	
Ra3 001229	Ra3 001303	
Ra3 001305	Ra3 001334	
Ra3 001335	Ra3 001387	
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Ra3 001430	Ra3 001430	
Ra3 001431	Ra3 001432	
Ra3 001436	Ra3 001436	
Ra3 001437	Ra3 001437	
Ra3 001438	Ra3 001454	
Ra3 001455	Ra3 001470	
Ra3 001471	Ra3 001471	
Ra3 001473	Ra3 001473	
Ra3 001474	Ra3 001474	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 001475	Ra3 001475	
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Ra3 001495	Ra3 001510	
Ra3 001511	Ra3 001511	
Ra3 001513	Ra3 001513	
Ra3 001514	Ra3 001518	
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Ra3 001529	Ra3 001529	
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Ra3 001537	Ra3 001542	
Ra3 001543	Ra3 001545	
Ra3 001546	Ra3 001552	
Ra3 001553	Ra3 001563	
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Ra3 001567	Ra3 001567	
Ra3 001568	Ra3 001575	
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Ra3 001578	Ra3 001579	
Ra3 001580	Ra3 001685	
Ra3 001717	Ra3 001718	
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Ra3 001735	Ra3 001741	
Ra3 001742	Ra3 001749	
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Ra3 001766	Ra3 001773	
Ra3 001774	Ra3 001774	
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Ra3 001782	Ra3 001782	
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Ra3 001790	Ra3 001806	
Ra3 001807	Ra3 001813	
Ra3 001814	Ra3 001814	
Ra3 001815	Ra3 001854	
Ra3 001847	Ra3 001847	
Ra3 001848	Ra3 001854	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 001856	Ra3 001905	
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Ra3 001917	Ra3 001924	
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Ra3 001952	Ra3 001974	
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Ra3 002013	Ra3 002013	
Ra3 002015	Ra3 002015	
Ra3 002016	Ra3 002016	
Ra3 002017	Ra3 002021	
Ra3 002022	Ra3 002023	
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Ra3 002054	Ra3 002071	
Ra3 002074	Ra3 002088	
Ra3 002075	Ra3 002075	
Ra3 002092	Ra3 002093	
Ra3 002094	Ra3 002096	
Ra3 002097	Ra3 002098	530
Ra3 002099	Ra3 002105	
Ra3 002107	Ra3 002133	
Ra3 002118	Ra3 002118	
Ra3 002134	Ra3 002134	
Ra3 002137	Ra3 002137	
Ra3 002138	Ra3 002138	
Ra3 002139	Ra3 002144	
Ra3 002145	Ra3 002168	
Ra3 002169	Ra3 002169	
Ra3 002170	Ra3 002175	
Ra3 002182	Ra3 002182	
Ra3 002183	Ra3 002183	
Ra3 002184	Ra3 002184	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 002188	Ra3 002190	
Ra3 002191	Ra3 002192	
Ra3 002193	Ra3 002193	
Ra3 002194	Ra3 002194	
Ra3 002195	Ra3 002212	
Ra3 002213	Ra3 002213	
Ra3 002214	Ra3 002216	
Ra3 002217	Ra3 002235	
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Ra3 002245	Ra3 002245	
Ra3 002246	Ra3 002248	
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Ra3 002251	Ra3 002253	
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Ra3 002256	Ra3 002256	
Ra3 002257	Ra3 002259	
Ra3 002260	Ra3 002260	
Ra3 002261	Ra3 002267	
Ra3 002268	Ra3 002268	
Ra3 002269	Ra3 002269	
Ra3 002270	Ra3 002270	
Ra3 002271	Ra3 002271	
Ra3 002272	Ra3 002278	
Ra3 002279	Ra3 002279	
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Ra3 002314	Ra3 002315	
Ra3 002316	Ra3 002318	
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Ra3 002320	Ra3 002322	
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Ra3 002328	Ra3 002328	
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Ra3 002333	Ra3 002336	
Ra3 002337	Ra3 002337	
Ra3 002338	Ra3 002339	
Ra3 002340	Ra3 002341	
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Ra3 002343	Ra3 002345	
Ra3 002346	Ra3 002346	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
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Ra3 002353	Ra3 002359	
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Ra3 002365	Ra3 002365	
Ra3 002366	Ra3 002366	
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Ra3 002411	Ra3 002413	
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Ra3 002459	Ra3 002459	
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Ra3 002492	Ra3 002492	
Ra3 002494	Ra3 002494	
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Ra3 002507	Ra3 002511	
Ra3 002535	Ra3 002541	
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Ra3 002551	Ra3 002551	
Ra3 002560	Ra3 002563	
Ra3 002564	Ra3 002564	
Ra3 002566	Ra3 002572	
Ra3 002574	Ra3 002574	
Ra3 002590	Ra3 002590	443
Ra3 002591	Ra3 002594	
Ra3 002595	Ra3 002598	
Ra3 002606	Ra3 002606	
Ra3 002617	Ra3 002617	
Ra3 002638	Ra3 002638	
Ra3 002639	Ra3 002639	
Ra3 002641	Ra3 002645	
Ra3 002646	Ra3 002646	
Ra3 002653	Ra3 002653	
Ra3 002654	Ra3 002654	
Ra3 002655	Ra3 002686	
Ra3 002669	Ra3 002669	
Ra3 002687	Ra3 002688	
Ra3 002689	Ra3 002689	445
Ra3 002699	Ra3 002699	
Ra3 002712	Ra3 002712	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 002745	Ra3 002745	482
Ra3 002747	Ra3 002747	
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Ra3 002802	Ra3 002802	
Ra3 002862	Ra3 002862	
Ra3 002886	Ra3 002886	
Ra3 002887	Ra3 002887	444
Ra3 002890	Ra3 002890	
Ra3 002910	Ra3 002910	
Ra3 002911	Ra3 002911	
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Ra3 002957	Ra3 002957	
Ra3 002958	Ra3 002958	
Ra3 002960	Ra3 002960	
Ra3 002961	Ra3 002963	
Ra3 002964	Ra3 002965	
Ra3 002968	Ra3 002977	
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Ra3 003008	Ra3 003008	
Ra3 003011	Ra3 003011	
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Ra3 003058	Ra3 003058	
Ra3 003059	Ra3 003059	518
Ra3 003062	Ra3 003062	
Ra3 003063	Ra3 003063	
Ra3 003064	Ra3 003064	
Ra3 003066	Ra3 003066	519
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Ra3 003068	Ra3 003068	
Ra3 003070	Ra3 003071	
Ra3 003074	Ra3 003079	
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Ra3 003083	Ra3 003083	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
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Ra3 003125	Ra3 003125	
Ra3 003125	Ra3 003125	
Ra3 003153	Ra3 003153	
Ra3 003165	Ra3 003165	
Ra3 003177	Ra3 003177	
Ra3 003207	Ra3 003207	
Ra3 003214	Ra3 003214	
Ra3 003223	Ra3 003223	
Ra3 003224	Ra3 003224	
Ra3 003235	Ra3 003236	
Ra3 003237	Ra3 003237	
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Ra3 003242	Ra3 003242	
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Ra3 003298	Ra3 003298	
Ra3 003299	Ra3 003301	
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Ra3 003303	Ra3 003303	
Ra3 003308	Ra3 003310	523
Ra3 003311	Ra3 003312	
Ra3 003314	Ra3 003314	
Ra3 003326	Ra3 003326	
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Ra3 003388	Ra3 003388	
Ra3 003389	Ra3 003389	
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Ra3 003512	Ra3 003512	
Ra3 003513	Ra3 003513	
Ra3 003514	Ra3 003514	
Ra3 003525	Ra3 003525	
Ra3 003526	Ra3 003532	533
Ra3 003541	Ra3 003541	
Ra3 003549	Ra3 003549	
Ra3 003550	Ra3 003550	
Ra3 003551	Ra3 003551	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
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Ra3 003579	Ra3 003579	
Ra3 003583	Ra3 003583	
Ra3 003594	Ra3 003594	
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Ra3 003616	Ra3 003616	
Ra3 003617	Ra3 003617	
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Ra3 003627	Ra3 003627	
Ra3 003645	Ra3 003645	
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Ra3 003790	Ra3 003790	
Ra3 003793	Ra3 003793	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 003795	Ra3 003795	
Ra3 003798	Ra3 003798	
Ra3 003808	Ra3 003814	
Ra3 003816	Ra3 003816	
Ra3 003826	Ra3 003832	
Ra3 003833	Ra3 003833	
Ra3 003835	Ra3 003840	
Ra3 003841	Ra3 003851	
Ra3 003852	Ra3 003862	
Ra3 003872	Ra3 003872	
Ra3 003897	Ra3 003902	
Ra3 003911	Ra3 003923	
Ra3 003932	Ra3 003932	
Ra3 003934	Ra3 003942	
Ra3 003988	Ra3 003990	534
Ra3 003996	Ra3 004029	
Ra3 004030	Ra3 004030	
Ra3 004031	Ra3 004031	
Ra3 004035	Ra3 004059	
Ra3 004060	Ra3 004061	
Ra3 004062	Ra3 004072	
Ra3 004073	Ra3 004084	
Ra3 004085	Ra3 004092	
Ra3 004093	Ra3 004104	
Ra3 004106	Ra3 004117	
Ra3 004122	Ra3 004122	
Ra3 004131	Ra3 004142	
Ra3 004144	Ra3 004146	
Ra3 004147.002	Ra3 004147.002	
Ra3 004147.003	Ra3 004147.004	522
Ra3 004148	Ra3 004165	
Ra3 004166	Ra3 004187	
Ra3 004337	Ra3 004404	
Ra3 004405	Ra3 004409	
Ra3 004410	Ra3 004413	
Ra3 004414	Ra3 004416	
Ra3 004417	Ra3 004418	
Ra3 004419	Ra3 004423	
Ra3 004424	Ra3 004425	
Ra3 004428	Ra3 004430	
Ra3 004432	Ra3 004432	
Ra3 004433	Ra3 004436	
Ra3 004455	Ra3 004458	
Ra3 004502	Ra3 004503	
Ra3 004504	Ra3 004504	
Ra3 004506	Ra3 004509	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 004532	Ra3 004532	
Ra3 004533	Ra3 004540	
Ra3 004553	Ra3 004553	
Ra3 004555	Ra3 004562	
Ra3 004571	Ra3 004571	
Ra3 004572	Ra3 004572	
Ra3 004579	Ra3 004579	
Ra3 004590	Ra3 004590	
Ra3 004604	Ra3 004606	
Ra3 004617	Ra3 004620	
Ra3 004682	Ra3 004682	
Ra3 004686	Ra3 004706	
Ra3 004707	Ra3 004726	
Ra3 004727	Ra3 004727	
Ra3 004728	Ra3 004728	
Ra3 004729	Ra3 004729	
Ra3 004730	Ra3 004730	
Ra3 004735	Ra3 004735	
Ra3 004747	Ra3 004747	
Ra3 004748	Ra3 004748	
Ra3 004754	Ra3 004754	
Ra3 004765	Ra3 004765	
Ra3 004766	Ra3 004766	
Ra3 004767	Ra3 004767	
Ra3 004771	Ra3 004771	383
Ra3 004785	Ra3 004795	
Ra3 004802	Ra3 004818	
Ra3 004819	Ra3 004825	
Ra3 004826	Ra3 004832	
Ra3 004843	Ra3 004843	
Ra3 004844	Ra3 004849	
Ra3 004850	Ra3 004852	
Ra3 004853	Ra3 004855	
Ra3 004856	Ra3 004858	
Ra3 004859	Ra3 004862	
Ra3 004863	Ra3 004866	
Ra3 004867	Ra3 004870	
Ra3 004871	Ra3 004878	
Ra3 004879	Ra3 004884	
Ra3 004885	Ra3 004888	
Ra3 004889	Ra3 004892	
Ra3 004893	Ra3 004895	
Ra3 004896	Ra3 004899	
Ra3 004902	Ra3 004903	
Ra3 004904	Ra3 004904	
Ra3 004905	Ra3 004905	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 004906	Ra3 004906	
Ra3 004907	Ra3 004907	
Ra3 004908	Ra3 004908	
Ra3 004909	Ra3 004913	
Ra3 004921	Ra3 004926	
Ra3 004927	Ra3 004927	
Ra3 004928	Ra3 004936	
Ra3 004940	Ra3 004946	
Ra3 004947	Ra3 004954	
Ra3 004955	Ra3 004958	
Ra3 004970	Ra3 004978	
Ra3 004979	Ra3 004986	
Ra3 004987	Ra3 004988	
Ra3 004989	Ra3 004999	
Ra3 005001	Ra3 005009	
Ra3 005010	Ra3 005016	
Ra3 005017	Ra3 005023	
Ra3 005024	Ra3 005029	
Ra3 005030	Ra3 005034	
Ra3 005035	Ra3 005038	
Ra3 005061	Ra3 005064	
Ra3 005084	Ra3 005087	
Ra3 005098	Ra3 005101	
Ra3 005102	Ra3 005105	
Ra3 005119	Ra3 005122	
Ra3 005145	Ra3 005148	
Ra3 005167	Ra3 005170	
Ra3 005181	Ra3 005184	
Ra3 005202	Ra3 005205	
Ra3 005229	Ra3 005230	
Ra3 005231	Ra3 005232	
Ra3 005233	Ra3 005235	
Ra3 005236	Ra3 005240	
Ra3 005243	Ra3 005245	
Ra3 005247	Ra3 005251	
Ra3 005252	Ra3 005256	
Ra3 005257	Ra3 005258	
Ra3 005259	Ra3 005261	
Ra3 005262	Ra3 005264	
Ra3 005265	Ra3 005267	
Ra3 005268	Ra3 005272	
Ra3 005274	Ra3 005275	
Ra3 005291	Ra3 005291	
Ra3 005294	Ra3 005294	
Ra3 005297	Ra3 005299	
Ra3 005315	Ra3 005317	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 005318	Ra3 005321	
Ra3 005322	Ra3 005323	
Ra3 005338	Ra3 005339	
Ra3 005340	Ra3 005340	
Ra3 005344	Ra3 005353	
Ra3 005390	Ra3 005394	
Ra3 005395	Ra3 005403	
Ra3 005422	Ra3 005423	
Ra3 005453	Ra3 005453	
Ra3 005454	Ra3 005459	
Ra3 005460	Ra3 005466	
Ra3 005467	Ra3 005473	
Ra3 005487	Ra3 005488	
Ra3 005492	Ra3 005493	
Ra3 005494	Ra3 005494	
Ra3 005496	Ra3 005497	
Ra3 005498	Ra3 005502	
Ra3 005509	Ra3 005511	
Ra3 005521	Ra3 005521	514
Ra3 005540	Ra3 005540	
Ra3 005541	Ra3 005603	
Ra3 005673	Ra3 005673	
Ra3 005676	Ra3 005676	
Ra3 005678	Ra3 005689	
Ra3 005695	Ra3 005714	510
Ra3 005695	Ra3 005695	
Ra3 005716	Ra3 005716	
Ra3 005727	Ra3 005727	
Ra3 005744	Ra3 005744	
Ra3 005745	Ra3 005745	
Ra3 005746	Ra3 005746	
Ra3 005776	Ra3 005776	
Ra3 005777	Ra3 005777	
Ra3 005796	Ra3 005803	
Ra3 005806	Ra3 005806	
Ra3 005807	Ra3 005807	
Ra3 005808	Ra3 005808	
Ra3 005828	Ra3 005828	
Ra3 005829	Ra3 005829	
Ra3 005871	Ra3 005874	
Ra3 005875	Ra3 005879	
Ra3 005880	Ra3 005882	
Ra3 005883	Ra3 005884	
Ra3 005885	Ra3 005886	
Ra3 005887	Ra3 005888	
Ra3 005889	Ra3 005889	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 005890	Ra3 005890	
Ra3 005891	Ra3 005895	
Ra3 005896	Ra3 005899	
Ra3 005900	Ra3 005901	
Ra3 005916	Ra3 005917	
Ra3 005918	Ra3 005918	
Ra3 005919	Ra3 005920	
Ra3 005944	Ra3 005944	
Ra3 005944	Ra3 005944	
Ra3 005948	Ra3 005949	
Ra3 005952	Ra3 005953	
Ra3 005959	Ra3 005959	
Ra3 005960	Ra3 005961	
Ra3 005971	Ra3 005973	
Ra3 005975	Ra3 005976	
Ra3 005977	Ra3 005978	
Ra3 005983	Ra3 005983	
Ra3 005984	Ra3 005984	
Ra3 005985	Ra3 005985	
Ra3 006027	Ra3 006032	
Ra3 006033	Ra3 006034	
Ra3 006037	Ra3 006038	
Ra3 006040	Ra3 006041	
Ra3 006044	Ra3 006047	
Ra3 006063	Ra3 006068	
Ra3 006071	Ra3 006073	
Ra3 006074	Ra3 006074	
Ra3 006078	Ra3 006078	
Ra3 006079	Ra3 006082	
Ra3 006097	Ra3 006108	
Ra3 006109	Ra3 006109	
Ra3 006112	Ra3 006113	
Ra3 006116	Ra3 006117	469
Ra3 006125	Ra3 006129	
Ra3 006130	Ra3 006130	
Ra3 006131	Ra3 006131	
Ra3 006135	Ra3 006138	
Ra3 006148	Ra3 006162	
Ra3 006167	Ra3 006171	
Ra3 006176	Ra3 006176	
Ra3 006177	Ra3 006189	
Ra3 006190	Ra3 006192	
Ra3 006193	Ra3 006196	
Ra3 006214	Ra3 006216	
Ra3 006216	Ra3 006216	
Ra3 006222	Ra3 006223	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 006225	Ra3 006230	
Ra3 006231	Ra3 006233	
Ra3 006234	Ra3 006245	
Ra3 006246	Ra3 006247	
Ra3 006248	Ra3 006249	
Ra3 006267	Ra3 006267	
Ra3 006269	Ra3 006230	
Ra3 006283	Ra3 006283	
Ra3 006299	Ra3 006299	
Ra3 006308	Ra3 006308	
Ra3 006353	Ra3 006353	538
Ra3 006355	Ra3 006355	
Ra3 006356	Ra3 006427	483
Ra3 006425	Ra3 006426	00215A
Ra3 006425	Ra3 006425	
Ra3 006729	Ra3 006729	
Ra3 006850	Ra3 006850	
Ra3 007090	Ra3 007093	
Ra3 007154	Ra3 007177	
Ra3 007212	Ra3 007218	
Ra3 007219	Ra3 007228	
Ra3 007229	Ra3 007276	
Ra3 007310	Ra3 007311	
Ra3 007324	Ra3 007326	
Ra3 007333	Ra3 007333	
Ra3 007337	Ra3 007338	
Ra3 007997	Ra3 008000	
Ra3 008005	Ra3 008008	535
Ra3 008074	Ra3 008075	
Ra3 008076	Ra3 008076	
Ra3 008077	Ra3 008114	
Ra3 008104	Ra3 008109	380
Ra3 008117	Ra3 008128	
Ra3 008131	Ra3 008140	
Ra3 008142	Ra3 008143	
Ra3 008144	Ra3 008159	537
Ra3 008175	Ra3 008233	00016A
Ra3 008234	Ra3 008237	
Ra3 008238	Ra3 008239	
Ra3 008240	Ra3 008240	
Ra3 008242	Ra3 008242	
Ra3 008243	Ra3 008244	
Ra3 008253	Ra3 008253	
Ra3 008255	Ra3 008258	00023A
Ra3 008259	Ra3 008259	
Ra3 008260	Ra3 008260	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 008261	Ra3 008261	
Ra3 008263	Ra3 008268	
Ra3 008269	Ra3 008281	
Ra3 008282	Ra3 008290	
Ra3 008300	Ra3 008300	
Ra3 008303	Ra3 008308	
Ra3 008312	Ra3 008317	
Ra3 008318	Ra3 008320	
Ra3 008321	Ra3 008343	
Ra3 008601	Ra3 008641	
Ra3 008650	Ra3 008668	
Ra3 008669	Ra3 008669	
Ra3 008671	Ra3 008671	
Ra3 008788	Ra3 008795	
Ra3 008922	Ra3 008922	
Ra3 008924	Ra3 008924	
Ra3 008926	Ra3 008927	
Ra3 008929	Ra3 008929	
Ra3 008930	Ra3 008930	513
Ra3 008931	Ra3 008932	
Ra3 008932.001	Ra3 008932.003	
Ra3 008933.001	Ra3 008933.001	
Ra3 008934.001	Ra3 008934.003	
Ra3 008936	Ra3 009109	
Ra3 009109.001	Ra3 009109.003	
Ra3 009128	Ra3 009128	
Ra3 009141	Ra3 009144	
Ra3 009162	Ra3 009200	
Ra3 009201	Ra3 009201	508
Ra3 009205	Ra3 009205	
Ra3 009216	Ra3 009220	
Ra3 009241	Ra3 009244	
Ra3 009253	Ra3 009256	
Ra3 009280	Ra3 009280	
Ra3 009380	Ra3 009391	
Ra3 009506	Ra3 009507	
Ra3 009514	Ra3 009516	493
Ra3 009520	Ra3 009521	
Ra3 009522	Ra3 009522	
Ra3 009523	Ra3 009523	
Ra3 009541	Ra3 009541	
Ra3 009542	Ra3 009544	
Ra3 009554	Ra3 009556	
Ra3 009991	Ra3 009991	
Ra3 010032	Ra3 010032	
Ra3 010083	Ra3 010083	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 010128	Ra3 010128	
Ra3 011633	Ra3 011671	
Ra3 011671	Ra3 011671	
Ra3 011673	Ra3 011674	
Ra3 011681	Ra3 011682	
Ra3 011683	Ra3 011683	
Ra3 011818	Ra3 011820	548
Ra3 011821	Ra3 011930	
Ra3 011931	Ra3 011931	
Ra3 011932	Ra3 011936	
Ra3 011940	Ra3 011943	
Ra3 011945	Ra3 012015	
Ra3 012016	Ra3 012016	
Ra3 012024.004	Ra3 012024.014	
Ra3 012024.020	Ra3 012024.025	
Ra3 012024.026	Ra3 012024.026	
Ra3 012024.039	Ra3 012024.042	
Ra3 012138	Ra3 012138	
Ra3 012439	Ra3 012439	
Ra3 012450	Ra3 012450	
Ra3 012492	Ra3 012498	
Ra3 012589	Ra3 012612	
Ra3 012621	Ra3 012621	
Ra3 012629	Ra3 012631	
Ra3 012656	Ra3 012656	
Ra3 012657	Ra3 012657	543
Ra3 012686	Ra3 012686	
Ra3 012782	Ra3 012786	
Ra3 012854	Ra3 012857	
Ra3 012861	Ra3 012863	
Ra3 012864	Ra3 012889	
Ra3 013014	Ra3 013014	
Ra3 013029	Ra3 013029	
Ra3 013030	Ra3 013032	
Ra3 013117	Ra3 013131	
Ra3 013132	Ra3 013190	
Ra3 013329	Ra3 013331	
Ra3 013338	Ra3 013339	
Ra3 013349	Ra3 013351	
Ra3 013507	Ra3 013508	
Ra3 013525	Ra3 013561	
Ra3 013641	Ra3 013642	
Ra3 013843	Ra3 013901	
Ra3 013908	Ra3 013908	
Ra3 013909	Ra3 013917	
Ra3 013932	Ra3 013963	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 013964	Ra3 013992	531
Ra3 013993	Ra3 014004	532
Ra3 014005	Ra3 014008	525
Ra3 014009	Ra3 014030	
Ra3 014031	Ra3 014034	
Ra3 014054	Ra3 014054	
Ra3 014056	Ra3 014056	
Ra3 014101	Ra3 014101	
Ra3 014115	Ra3 014115	
Ra3 014118	Ra3 014118	
Ra3 014119	Ra3 014119	
Ra3 014129	Ra3 014129	
Ra3 014137	Ra3 014137	542
Ra3 014142	Ra3 014142	
Ra3 014145	Ra3 014145	
Ra3 014146	Ra3 014146	
Ra3 014147	Ra3 014147	
Ra3 014148	Ra3 014148	
Ra3 014173	Ra3 014173	
Ra3 014180	Ra3 014180	
Ra3 014209	Ra3 014209	
Ra3 014210	Ra3 014210	
Ra3 014510	Ra3 014511	
Ra3 014521	Ra3 014521	
Ra3 014554	Ra3 014555	
Ra3 014571	Ra3 014583	
Ra3 014625	Ra3 014626	
Ra3 014657	Ra3 014658	
Ra3 014687	Ra3 014688	
Ra3 014689	Ra3 014691	
Ra3 014757	Ra3 014757	
Ra3 014760	Ra3 014760	
Ra3 014811	Ra3 014812	
Ra3 014846	Ra3 014846	
Ra3 014864	Ra3 014865	
Ra3 014867	Ra3 014867	
Ra3 014868	Ra3 014868	
Ra3 014885	Ra3 014886	
Ra3 015194	Ra3 015207	
Ra3 015327	Ra3 015329	
Ra3 015332	Ra3 015332	
Ra3 015333	Ra3 015340	
Ra3 015341	Ra3 015350	
Ra3 015426	Ra3 015427	
Ra3 015478	Ra3 015478	
Ra3 015479	Ra3 015533	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 015535	Ra3 015536	
Ra3 015538	Ra3 015539	
Ra3 015540	Ra3 015540	
Ra3 015541	Ra3 015627	
Ra3 015628	Ra3 015636	
Ra3 015638	Ra3 015650	
Ra3 015651	Ra3 015685	
Ra3 015689	Ra3 015695	521
Ra3 015710	Ra3 015720	
Ra3 015721	Ra3 015731	
Ra3 015738	Ra3 015738	
Ra3 015763	Ra3 015763	
Ra3 015776	Ra3 015776	
Ra3 015777	Ra3 015777	
Ra3 015782	Ra3 015782	
Ra3 015814	Ra3 015817	
Ra3 015822	Ra3 015823	
Ra3 015824	Ra3 015824	
Ra3 015825	Ra3 015825	
Ra3 015863	Ra3 015885	545
Ra3 015886	Ra3 015887	
Ra3 015912	Ra3 015954	
Ra3 016012	Ra3 016013	
Ra3 016073	Ra3 016075	
Ra3 016080	Ra3 016080	
Ra3 016157	Ra3 016162	
Ra3 016163	Ra3 016170	
Ra3 016176	Ra3 016193	
Ra3 016194	Ra3 016194	
Ra3 016198	Ra3 016230	524
Ra3 016534	Ra3 016534	
Ra3 016770	Ra3 016798	
Ra3 016799	Ra3 016804	
Ra3 016805	Ra3 016806	
Ra3 016819	Ra3 016820	
Ra3 016821	Ra3 016956	
Ra3 016963	Ra3 016966	
Ra3 016968	Ra3 016969	
Ra3 016970	Ra3 016971	
Ra3 016972	Ra3 016972	
Ra3 016973	Ra3 016976	
Ra3 016977	Ra3 016980	
Ra3 016981	Ra3 016982	
Ra3 016983	Ra3 016984	
Ra3 017090	Ra3 017093	
Ra3 017178	Ra3 017182	

Bates - Begin	Bates - End	Plaintiff's Ex. No.
Ra3 017207	Ra3 017210	
Ra3 017211	Ra3 017215	
Ra3 017216	Ra3 017231	
Ra3 017303	Ra3 017318	
Ra3 017319	Ra3 017331	
Ra3 017332	Ra3 017332	
Ra3 017333	Ra3 017360	
Ra3 017361	Ra3 017376	
Ra3 017377	Ra3 017381	
Ra3 017382	Ra3 017387	
Ra3 017388	Ra3 017388	
Ra3 017389	Ra3 017391	
Ra3 017392	Ra3 017396	
Ra3 017397	Ra3 017401	
Ra3 017402	Ra3 017406	
Ra3 017407	Ra3 017412	
Ra3 017413	Ra3 017417	
Ra3 017418	Ra3 017418	
Ra3 017419	Ra3 017419	
Ra3 017420	Ra3 017420	
Ra3 017421	Ra3 017421	
Ra3 017423	Ra3 017430	
Ra3 017431	Ra3 017436	
Ra3 017437	Ra3 017442	
Ra3 017443	Ra3 017443	
Ra3 017444	Ra3 017455	
Ra3 017456	Ra3 017480	
Ra3 017564	Ra3 017568	
Ra3 017585	Ra3 017586	
Ra3 017921	Ra3 017935	
Ra3 017937	Ra3 017944	
Ra3 017945	Ra3 017951	
Ra3 017959	Ra3 017960	
Ra3 017961	Ra3 017969	
Ra3 018637.280	Ra3 018637.281	
Ra3 023372	Ra3 023375	
Ra3 023522	Ra3 023531	
Ra3 023533	Ra3 023594	559