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*Attorneys for the United States of America*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH

In Re:

RaPower-3, LLC

Debtor.

Case No. 18-24865

Chapter 11

Honorable Kevin R. Anderson

**MOTION FOR ADMISSION PRO HAC VICE AND CONSENT  
OF DESIGNATED ASSOCIATE LOCAL COUNSEL**

I, John K. Mangum, hereby move the pro hac vice admission of Erin Healy Gallagher as counsel for the United States to practice in this Court. I hereby agree to serve as designated local counsel for the subject case; to readily communicate with opposing counsel and the Court regarding the conduct of this case; and to accept papers when served and recognize my responsibility and full authority to act for and on behalf of the United States in all case-related proceedings, including hearings, pretrial conferences, and trials, should applicant fail to respond to any Court order. The application for *pro hac vice* admission is attached as Exhibit A to this Motion and her ECF Registration form is attached as Exhibit B. Any admission fee is waived because Ms. Healy Gallagher is an attorney of the United States government not residing in Utah, as shown on her attached application.

Dated: 3 July 2018

/s/ John K. Mangum, Assistant United States Attorney

Utah Bar Number 2072

**CERTIFICATE OF SERVICE BY ELECTRONIC NOTICE (CM/ECF)**

I hereby certify that on July 3, 2018, I electronically filed the foregoing **MOTION FOR ADMISSION PRO HAC VICE AND CONSENT OF DESIGNATED ASSOCIATE LOCAL COUNSEL** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users.

David E. Leta  
Jeff D. Tuttle  
Snell & Wilmer  
*Counsel for Debtor RaPower-3, LLC*

John T. Morgan, Trustee  
U.S. Trustees Office

/s/ John K. Mangum