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**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

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

Defendants.

**MOTION TO EXTEND TIME TO FILE  
REPLIES TO RESPONSES TO THE  
MOTION TO INTERVENE**

Civil No: 2:15cv-00828-DN

District Judge David Nuffer

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Prospective Intervenors Preston Olsen and Elizabeth Olsen, and all other similarly situated taxpayers represented by attorney Paul Jones in the United States Tax Court<sup>1</sup> (collectively referred to as the “Intervenors”) hereby respectfully move pursuant to Fed. R. Civ. P. 6(b)(1)(A) and DUCivR 7-1(b)(3)(B), for an extension of time until October 8, 2021, to reply to the responses filed by the United States (Dkt. No. 1152) and the Receiver Wayne Klein (Dkt. No. 1153) to Intervenors Motion to Intervene (Dkt. No. 1143). Counsel for the Intervenors received approval and consent for the requested extension from counsel for the United States and the Receiver. The purpose of the extension is to allow counsel for the Intervenors to prepare and file replies while

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<sup>1</sup> See Exhibit A to Dkt. No. 1143.

accommodating his workload issues in conjunction with appropriate consideration of the legal and factual issues presented in the responses. This extension request is not made for purposes of undue delay and no party will be prejudiced by the extension.

Dated this 22<sup>th</sup> day of September, 2021

HALE & WOOD, PLLC

*/s/ Paul W. Jones*

Paul W. Jones

*Attorney for Intervenors*

**CERTIFICATE OF SERVICE**

I hereby certify that the above **MOTION TO EXTEND TIME TO FILE REPLIES TO RESPONSES TO THE MOTION TO INTERVENE** was filed with the Court on this 22th day of September, 2021 and served via ECF on all parties who have requested notice in this case.

Copies were also sent by mail to:

Neldon Johnson  
Post Office Box 95332  
South Jordan, UT 84095

R. Gregory Shepard  
858 Clover Meadow Drive  
Murray, UT 84123

/s/ Paul W. Jones

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