

JUSTIN D. HEIDEMAN (USB No. 8897)

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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, *et al*,

*Defendants.*

**DEFENDANTS' OBJECTION TO  
THE SUBPOENA ISSUED TO  
TODD ANDERSON AND MOTION  
TO QUASH SUBPOENA**

Case No. 2:15-CV-0828 DN

Judge: Honorable David Nuffer  
Magistrate Judge Brooke Wells

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Defendants RaPower-3, LLC; International Automated Systems, LLC; LTB1, LLC; and Neldon Johnson, ("Defendants") by and through counsel of record, Justin D. Heideman, of the law firm Heideman & Associates, hereby submit this *Objection to the Subpoena to Todd Anderson and Joinder in Motion to Quash Subpoena* pursuant to DuCiv. R. 37-1(a)(9).

Defendants object to the subpoena issued to Todd Anderson and join Todd Anderson's Motion to Quash (Doc. 124). Defendants assert that the documents, information, and testimony requested are protected by Fed. R. Civ. P. 501 and Utah Code section 78B-1-137(2). Defendants do not consent to any disclosure of the privileged information, and insist that the privilege be

maintain in its strictest fashion. Defendants incorporate by reference the arguments raised by Todd Anderson's motion to quash. (Doc. 124).

**CONCLUSION**

Therefore, Defendants pray the court issue an expedited order that Todd Anderson need not appear at the February 17, 2017 deposition and need not supply information regarding his representation of and communications with Defendants.

SIGNED and DATED this 14th day of February, 2017.

**HEIDEMAN & ASSOCIATES**

/s/ Justin D. Heideman

JUSTIN D. HEIDEMAN

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

**CERTIFICATE OF SERVICE**

On this 14<sup>th</sup> day of February, 2017, I hereby certify a true and correct copy of the forgoing **DEFENDANTS' OBJECTION TO THE SUBPOENA ISSUED TO TODD ANDERSON AND JOINDER IN MOTION TO QUASH SUBPOENA** was served on the following:

<b>Party/Attorney</b>	<b>Method</b>
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/s/ Wendy Poulson  
Legal Assistant