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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.	Civil No. 2:15-cv-00828 DN UNITED STATES' MOTION FOR LEAVE TO FILE MOTIONS TO COMPEL DEPOSITION TESTIMONY UNDER SEAL Judge David Nuffer Magistrate Judge Brooke C. Wells
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The United States moves the Court for an order permitting it to file motions to compel deposition testimony under seal.

The United States intends to file motions to compel deposition testimony from three individuals: Cody Buck, Ken Oveson, and David Mantyla. The factual support for these motions draws from documents that the defendants and third parties have designated “CONFIDENTIAL” and “CONFIDENTIAL-ATTORNEY’S EYES ONLY” in accordance with the protective order entered in this case.¹ Consistent with the protective order and DUCivR 5-2, and 26-2, the United States requests leave to file these motions, their supporting exhibits, and deposition transcripts under seal. In making this request, the United States does not concede that the designations are proper and reserves the right to challenge them.²

WHEREFORE, the United States requests leave to file its motions to compel deposition testimony of Cody Buck, Ken Oveson, and David Mantyla under seal.

¹ Doc. No. 116.

² *Id.* ¶ 8(a).

Dated: March 9, 2017

Respectfully submitted,

/s/ Christopher R. Moran

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***ATTORNEYS FOR THE
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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2017, the foregoing document was electronically filed with the Clerk of the Court through the CM/ECF system, which sent notice of the electronic filing to the following:

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I further certify that I sent the foregoing document to counsel for Cody Buck, Ken Oveson, Dave Mantyla via U.S. Mail:

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