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IN THE UNITED STATES DISTRICT COURT
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.

**MOTION TO FILE RESPONSE
UNDER SEAL**

[FILED UNDER SEAL]

Case No. 2:15-cv-00828 DN

Honorable David Nuffer
Magistrate Judge Brooke C. Wells

Cody Buck, Ken Oveson and David Mantyla, (“Movant Parties”) through undersigned counsel, hereby moves the Court for an order allowing them to file their response to the United States’ Motion to Compel testimony under seal. This motion is based upon the fact that Movant Parties’ response discusses their prior representation of the defendants which may contain sensitive and/or confidential material that should not be made available to the public.

Additionally, the United States' Motion to Compel was filed under seal and Movant Parties ask that their response likewise be filed under seal.

RESPECTFULLY SUBMITTED this 24th day of March, 2017.

RAY QUINNEY & NEBEKER P.C.

/s/ Eric G. Benson

Attorney for Movant Parties, Cody Buck, Ken
Oveson and David Mantyla

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of March, 2017, I sent a copy of the foregoing by electronically mail to the following:

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