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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

CENTRAL DIVISION

UNITED STATES OF AMERICA, Plaintiff, Counterclaim Defendant v. RAPOWER-3, LLC, et al., Defendant.

<p>MOTION FOR EXTENSION OF TIME TO RESPOND TO UNITED STATES’ RENEWED MOTION TO COMPEL TODD ANDERSON TO PRODUCE DOCUMENTS</p>

<p>Case No.: 2:15-cv-00828-DN-BCW</p>

On May 18, 2016, the United States of America filed its Renewed Motion to Compel Todd Anderson to Produce Documents. (Doc. 163.) The following day, counsel for RaPower filed a motion to withdraw as counsel, citing termination of services by the client as grounds. (Doc. 164.) Counsel for Todd Anderson then contacted counsel for the United States to discuss these recent filings and to request an extension of time in which to respond to the motion to compel since Anderson’s former client RaPower has a direct interest therein but its ability to respond to the motion to compel is in question and/or potentially delayed in view of the apparent search for new counsel. Counsel for the United States was not opposed to Anderson’s request

for more time under the circumstances. Specifically, counsel for the United States (Ms. Healy Gallagher) authorized the undersigned to represent to the Court that the United States will not oppose Anderson's request to extend the deadline to respond to the motion to compel through and including the fifth day following this Court's decision on the pending motion to withdraw. This motion is timely made as the original time for Anderson to respond to the motion to compel (no earlier than May 22) has not yet expired. The undersigned requests an order in conformity with this agreement.

DATED this 22nd day of May, 2017.

STRONG & HANNI

/s/ Bryon G. Martin

Byron G. Martin
Attorneys for Todd Anderson

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May, 2017 a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO RESPOND TO UNITED STATES' RENEWED MOTION TO COMPEL TODD ANDERSON TO PRODUCE DOCUMENTS** 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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