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**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH**

**CENTRAL DIVISION**

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UNITED STATES OF AMERICA,

Plaintiff, Counterclaim Defendant

v.

RAPOWER-3, LLC, et al.,

Defendant.

**REPLY MEMORANDUM IN  
SUPPORT OF MOTION TO  
CONTINUE HEARING ON UNITED  
STATES' RENEWED MOTION TO  
COMPEL TODD ANDERSON TO  
PRODUCE DOCUMENTS**

Case No.: 2:15-cv-00828-DN-EJF

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Non-party Todd Anderson submits the following in reply to the United States' opposition memorandum [doc. 185].

First, counsel for Todd Anderson is available on June 23 on or after 2:00 p.m., like counsel for the United States and RaPower. It appears that would be more efficient and less costly to the United States than certain other options, according to its memorandum. It also

seems prudent that counsel for the holder of the privilege – Mr. Snuffer – be given as much time as possible to be up to speed on the issues prior to that hearing. And finally, the United States seems to imply that Mr. Schultz is available to cover the hearing on June 15. The undersigned considers Mr. Schultz to be unavailable in practical ways, including his lack of familiarity with the proceedings in recent months and also because the insurer carrier has denied his ongoing involvement in the case. And educating one of the other multiple attorneys in the firm as implied by the United States is impractical and unduly expensive. When weighed against only a small delay and the other factors herein, there is good cause to continue the hearing.

DATED this 9th day of June, 2017.

**STRONG & HANNI**

*/s/ Byron G. Martin*

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Byron G. Martin  
*Attorneys for Todd Anderson*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of June, 2017 a true and correct copy of the foregoing  
**REPLY MEMORANDUM IN SUPPORT OF MOTION TO CONTINUE HEARING ON  
UNITED STATES' RENEWED MOTION TO COMPEL TODD ANDERSON TO  
PRODUCE DOCUMENTS** was served by the method indicated below, to the following:

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