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LTB1, and Neldon Johnson

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-EJF

TODD ANDERSON'S RESPONSE TO SUBPOENA FOR RECORDS

Judge David Nuffer Magistrate Judge Evelyn J. Furse

Pursuant to the Court's Order on Motion to Compel Todd Anderson to Produce

Documents [Doc. 206], Defendants Rapower-3, LLC, International Automated Systems, Inc.,
and Neldon Johnson ("Defendants"), by and through their counsel of record, hereby produce to
the United States all documents identified in rows 21 through 32 (Bates Numbers Anderson 135
through Anderson 222) and rows 36 through 38 (Bates numbers Anderson 232 through Anderson
241) of the Supplemental Privilege Log [Doc. No. 163-11].

Documents marked as Anderson 136 to Anderson 140 are <u>not</u> produced herewith as those documents are not related to the Anderson letter or to any issue or claim in the current proceedings but rather the unrelated subject of patronage dividends in a grocery (or similar industry) co-operative ownership structure.

DATED this 7th day of July, 2017.

NELSON, SNUFFER, DAHLE & POULSEN, P.C.

/s/ Steven R. Paul

Attorneys for Defendants RAPower-3, LLC, International Automated Systems, Inc., LTB1, and Neldon Johnson