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

**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.

**DEFENDANTS' JOINT INITIAL
DISCLOSURES**

No. 2:15-cv-00828 DN

Judge David Nuffer

Defendants jointly submit the following as initial disclosures pursuant to Fed.R.Civ.P.26.

Individuals Likely to Have Discoverable Information Supporting Defendants' Defenses

**Plaintiff
Exhibit**

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1. Neldon Johnson
c/o Sam Alba

Mr. Johnson, Inventor, Engineer, CEO, Construction Manager, will testify about the RaPower -3, LLC, International Automated Systems, Inc., LTB1, LLC technologies, development of the technology, patents, implementation of the technology and operation of the businesses.

2. Gregory Shepard
c/o Donald Reay

Mr. Shepherd, Chief Director of Operations of RaPower-3, LLC will testify about the daily operations and sales of RaPower-3, LLC.

3. Matthew Shepard
c/o Donald Reay

Mr. Shepard will testify about the various promotional material and various website, YouTube videos and online materials.

4. Roger Freeborn
c/o Donald Reay

Mr. Freeborn, National Director of RaPower3, will testify about the daily operations and sales of RaPower-3, LLC.

5. Glenda Johnson
c/o Sam Alba

Ms. Johnson will testify about the daily operations of RaPower -3, LLC, International Automated Systems, Inc., LTB1, LLC.

Description of Documents Supporting Defendants' Defenses

The documents required by Rule 26(a)(1)(B) will be provided once the Protective Order is in place. Defendants will provide documents that fall into the following categories, Patents, other technology documents, documents evidencing operations of the business to develop and build the technology, and schematic drawings.

Computation of Damages

Not applicable.

Insurance Agreement

Not applicable.

DATED this 22nd day of April, 2016.

SNOW CHRISTENSEN & MARTINEAU

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REAY LAW, PLLC

/s/ Donald Reay
Donald Reay
Attorney for Greg Shepard and Roger Freeborn

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of April, 2016, the foregoing **Defendants' Joint Initial Disclosures** was sent via Email to the following:

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