



US v. RaPower-3, LLC, et al.: exhibits notes from this morning

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Cc:

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History: This message has been replied to.

Dear Judge Nuffer and Counsel,

Here is a list of exhibits that the United States moved to admit this morning.

1. The final version of the Deposition Designation Forms, which we emailed to both Chambers and counsel for defendants on March 31, 2018. It is a very large email, so it is not attached here, but of course we can re-send it if needed:
 - a. PLEX 448, Deposition Designation Form for Mike Penn
 - b. PLEX 579, Deposition Designation Form for Neldon Johnson, vol. 1
 - c. PLEX 581, Deposition Designation Form for IAS's Rule 30(b)(6) deposition
 - d. PLEX 673, Deposition Designation Form for LTB1's Rule 30(b)(6) deposition
 - e. PLEX 681, Deposition Designation Form for Neldon Johnson, vol. 2
 - f. PLEX 682, Deposition Designation Form for RaPower-3's Rule 30(b)(6) deposition
 - g. PLEX 683, Deposition Designation Form for John Howell
 - h. PLEX 685, Deposition Designation Form for R. Gregory Shepard
 - i. PLEX 687, Deposition Designation Form for Robert Aulds
 - j. PLEX 688, Deposition Designation Form for Roger Freeborn
 - k. PLEX 689, Deposition Designation Form for Peter Gregg
 - l. PLEX 690, Deposition Designation Form for Roger Halverson
 - m. PLEX 693, Deposition Designation Form for Frank Lunn
 - n. PLEX 697, Deposition Designation Form for Brian Zeleznik
 - o. PLEX 713, Deposition Designation Form for PacifiCorp's Rule 30(b)(6) deposition

Please note that we have not filed the final version of all of these Forms on the docket. If the Court would like us to do that, please let us know.

2. Exhibits that are in our Deposition Designation Forms, but not identified on Court Exhibit 2, that we believe were admitted into evidence yesterday, but wish to confirm:
 - a. PLEX 197 – used in PacifiCorp Deposition Designations, which is Pl. Ex. 713 (ECF 360 at page 1046 of 1103)
 - b. PLEX 334 – used in Peter Gregg Deposition Designations, which is Pl. Ex. 689 (ECF 360 at page 444 of 1103)
 - c. PLEX 483 – used in IAS Deposition Designations, which is Pl. Ex. 581 (ECF 302-2 at page 90 of 98)

- d. PLEX 504 – used in RaPower-3 Deposition Designations, which is Pl. Ex. 682 (ECF 302-5 at page 45 of 60)
 - e. PLEX 526 – used in IAS Deposition Designations, which is Pl. Ex. 581 (ECF 302-2 at page 44 of 98)
 - f. PLEX 530 – used in IAS Deposition Designations, which is Pl. Ex. 581 (ECF 302-2 at page 51 of 98)
 - g. PLEX 544 – used in RaPower-3 Deposition Designations, which is Pl. Ex. 682 (ECF 302-5 at page 30 of 60)
 - h. PLEX 545 – used in RaPower-3 Deposition Designations, which is Pl. Ex. 682 (ECF 302-5 at page 32 of 60)
 - i. PLEX 550 – used in RaPower-3 Deposition Designations, which is Pl. Ex. 682 (ECF 302-5 at page 44 of 60)
 - j. PLEX 554 – used in LTB Deposition Designations, which is Pl. Ex. 673 (ECF 302-3 at page 31 of 63)
 - k. PLEX 589 – used in John Howell Deposition Designations, which is Pl. Ex. 683 (ECF 360 at page 181 of 1103)
 - l. PLEX 590 – used in John Howell Deposition Designations, which is Pl. Ex. 683 (ECF 360 at page 181 of 1103)
3. Exhibits that we moved to admit:
- a. PLEX 413 – Neldon Johnson’s Response to the United States’ First Interrogatories
 - b. PLEX 414 – RaPower-3’s Response to the United States’ First Interrogatories
 - c. PLEX 415 – IAS’s Response to the United States’ First Interrogatories
 - d. PLEX 416 – LTB1’s Response to the United States’ First Interrogatories
 - e. PLEX 668 – Email from Steven Paul re USA v. RaPower - document production

Respectfully submitted,

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