

## Healy Gallagher, Erin (TAX)

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**From:** Edwin S. Wall <edwin@edwinwall.com>  
**Sent:** Friday, June 28, 2019 11:32 AM  
**To:** Healy Gallagher, Erin (TAX); wklein@kleinutah.com; 'Mike Lehr'; Hines, Erin R. (TAX)  
**Cc:** 'Denver Snuffer'; 'STEVEN PAUL'; joshua.egan@me.com; 'Joshua E'; 'Dan Garriott'; 'Greg Shepard'; 'Kate Conyers'; 'Heather Stokes'  
**Subject:** RE: Johnson, Neldon: Status - An Enlargement of Time to Complete Draft May Be Needed

Erin and Mike:

Would you be willing to agree to a three (3) week extension on the deadlines and hearing with regard to the declaration project. We have been working very diligently, with Kate Conyers doing some seriously heavy lifting, in getting the necessary information together as much as possible. Even so, it has not been efficient and it taking more time than anticipated.

The factors that have delayed matters and justify an extension of time are manifold:

- we had about a four day delay at the outset, as it took more time than anticipated to get the receiver's hard drive loaded and delivered;
- we have had a challenged identifying the various accountants, what information they have (if any), and have yet to obtain the information we want from them;
- we requested responsive documents from Pacific Stock Transfer, which they sent to the Receiver, although we requested them and we still need to go through them;
- it took longer than we anticipated to obtain the hard drive of information and documents which were delivered by Neldon to Neldon Snuffer; and,
- we have a great deal of information to compile, organize and then review with Neldon.

Also, yesterday, Neldon left town for Delta, Utah, and may be traveling to Texas. He will return Monday morning.

Additionally, and of great significance to amount of time requested, Kate Conyers, will be gone all next week. She agreed to undertake the challenge of doing the heavy lifting as I noted above, but did not realize how much time it would take and that it would extend into July. She has had a long planned trip which she cannot cancel.

Please consider this request and let me know today if you are willing to stipulate to the extension. I would like to file the motion today, as early as possible. Thank you. - Ed

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**From:** Edwin S. Wall <edwin@edwinwall.com>  
**Sent:** Wednesday, June 19, 2019 3:54 PM  
**To:** 'Healy Gallagher, Erin (TAX)' <Erin.HealyGallagher@usdoj.gov>; 'wklein@kleinutah.com' <wklein@kleinutah.com>; 'Mike Lehr' <mlehr@parrbrown.com>; 'Hines, Erin R. (TAX)' <Erin.R.Hines@usdoj.gov>  
**Cc:** 'Denver Snuffer' <denversnuffer@gmail.com>; 'STEVEN PAUL' <spaul@nsdplaw.com>; 'joshua.egan@me.com' <joshua.egan@me.com>; 'Joshua E' <joshua.d.egan@gmail.com>; 'Dan Garriott' <dbgarrriott@msn.com>; 'Greg Shepard' <greg@rapower3.com>; 'Kate Conyers' <kate@conyersnix.com>; 'Heather Stokes' <hstokes\_@msn.com>  
**Subject:** Johnson, Neldon: Status - An Enlargement of Time to Complete Draft May Be Needed

**Plaintiff  
Exhibit**

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Erin and Mike – There appears there may be arising a need for me seek an enlargement of time to obtain further information with regard to my task of putting together the declaration of Neldon Johnson regarding the various assets and accounts. There was a delay of a few days in getting the receiver’s documents and we only just today received 170 GB of materials from Neldon Snuffer. We are in the process of seeking materials from the accountants, but that has yet to be obtained.

The Court’s Minute Entry, Dkt. 685, requires we provide a draft of the complete statements of records and inventory of what has been produced by 6/28/2019, and a final draft by 7/8/2019.

My notes indicate the Court asked that the draft to the government by 6/21/19, with the government’s feedback by 6/28/19 and the final by 7/8/19. We won’t be able to have the draft done by the 21<sup>st</sup>.

We are going to diligently continue to try to meet the court’s schedule as reflected in the Minute Entry as I know the court does not want matters further delayed. However, we have yet to obtain everything needed. When we are a bit closer to the 28<sup>th</sup> I will give you an update and let you know if more time may need to be requested. - Ed

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