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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

DECLARATION OF ERIN HEALY GALLAGHER

District Judge David Nuffer

I, Erin Healy Gallagher, pursuant to 28 U.S.C. § 1746, hereby declare that:

1. I am an Assistant Chief for the Tax Division's Civil Trial Section - Central

Region, at the United States Department of Justice, and I am a trial attorney of record assigned

responsibility for this case.

2. I have reviewed the United States' records recording both attorney's fees and

costs related to bringing the Motion for Order to Show Cause Why Neldon Johnson, R. Gregory

Shepard, Glenda Johnson, LaGrand Johnson, and Randale Johnson Should Not Be Held in Civil

Contempt of Court and enforcing the Court's Corrected Receivership Order.

3. Attached as Plaintiff's Exhibit 957 is a true and correct copy of an Excel sheet I

created to summarize those records. The amounts identified for each line item are correct.

Receipts for costs greater than \$100 are also attached to Pl. Ex. 957.

4. As shown on Pl. Ex. 957 at 3-4, the United States has incurred at least \$22,044.12

in attorneys' fees and \$3,102.73 in costs, for a total of \$25,146.85 in fees and costs, to bring its

motion for order to show cause and to enforce the Corrected Receivership Order.

I HEREBY DECLARE under penalty of perjury that the foregoing is true and correct to

the best of my information and belief.

Dated: July 1, 2019

/s/ Erin Healy Gallagher

ERIN HEALY GALLAGHER

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