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IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF UTAH, CENTRAL DIVISION

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>vs.</p> <p>RAPOWER-3, LLC, INTERNATIONAL AUTOMATED SYSTEMS, INC., LTB1, LLC, R. GREGORY SHEPARD, NELDON JOHNSON, and ROGER FREEBORN,</p> <p>Defendants.</p>	<p>Civil No. 2:15-cv-00828 DN</p> <p><b>UNITED STATES' MOTION TO EXTEND TIME TO FILE DRAFT PROPOSED FINDINGS AND CONCLUSIONS RE: CIVIL CONTEMPT OF NELDON JOHNSON, GLENDA JOHNSON, LAGRAN JOHNSON, AND RANDALE JOHNSON</b></p> <p>Judge David Nuffer</p>
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Pursuant to Fed. R. Civ. P. 6(b)(1)(A), the United States respectfully requests an extension of time to file its draft proposed findings and conclusions after the proceedings on the motion for additional sanctions due to continued contempt of Neldon Johnson, Glenda Johnson, LaGrand Johnson, and Randale Johnson.<sup>1</sup> The Court ordered that counsel for the United States circulate a draft, and file notice of the same, on March 17, 2020.<sup>2</sup> Counsel for the Johnsons were to respond on March 27, and the United States was to submit a final draft on April 5.<sup>3</sup>

We have made best efforts to prepare the initial draft for timely circulation on March 17. However, other litigation and leadership demands, particularly the changing landscape of the response required to COVID-19, have prevented undersigned counsel from completing the initial draft to date. Therefore, we ask that the circulation and notice-filing dates be extended as follows:

United States' opening draft: March 30, 2020;

The Johnsons' redline response: April 9, 2020; and

United States' final draft: April 20, 2020.

Counsel for the Johnsons and for the Receiver have authorized the United States to confirm that they consent to the relief we request.

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<sup>1</sup> ECF No. 754.

<sup>2</sup> See ECF No. 863 (Minute Order for hearing held Feb. 25, 2020).

<sup>3</sup> See *id.*

In light of the foregoing good cause, the United States respectfully requests that the Court enter the proposed order, submitted consistent with the Local Rules, granting the requested relief.

Dated: March 16, 2020

Respectfully submitted,

*/s/ Erin Healy Gallagher* \_\_\_\_\_

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***ATTORNEYS FOR THE  
UNITED STATES***

**CERTIFICATE OF SERVICE**

I hereby certify that on March 16, 2020, the foregoing UNITED STATES' MOTION TO EXTEND TIME TO FILE DRAFT PROPOSED FINDINGS AND CONCLUSIONS RE: CIVIL CONTEMPT OF NELDON JOHNSON, GLENDA JOHNSON, LAGRAN JOHNSON, AND RANDALE JOHNSON was electronically filed with the Clerk of the Court through the CM/ECF system, which sent notice of the electronic filing to all counsel of record.

/s/ Erin Healy Gallagher  
ERIN HEALY GALLAGHER  
Trial Attorney