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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, and NELDON JOHNSON,</p> <p>Defendants.</p>	<p>Civil No. 2:15-cv-00828-DN</p> <p>MOTION FOR EXTENSION OF TIME TO RESPOND TO UNITED STATES’ MOTION FOR RULE 11 SANCTIONS (ECF 964)</p> <p>Judge David Nuffer</p>
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Based on the agreement of the parties, the Law Firm of Nelson, Snuffer, Dahle & Poulsen, P.C. (NSDP), requests an extension of time to respond to United States’ “Motion for Rule 11 Sanctions Regarding ECF No. 931, ‘Rule 60 Motion to Set Aside Judgment Against Defendants (Newly Discovered Evidence) (Fraud on the Court).’” Pursuant to the agreement of the parties, NSDP’s opposition is due August 12, 2020.

Counsel for the United States has authorized NSDP to say that the United States consents to the requested relief, that the opposition to the motion will be due on August 12, 2020. See attached.

DATED this 27th day of July, 2020.

NELSON SNUFFER DAHLE & POULSEN

/s/ Steven R. Paul
Denver C. Snuffer, Jr.
Daniel B. Garriott
Steven R. Paul

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed using the court's CM/ECF filing system and that system sent notice of filing to all counsel and parties of record.

In addition, the foregoing was mailed or emailed as indicated to the following who are not registered with CM/ECF.

/s/ Steven R. Paul
Attorneys for R. Gregory Shepard

Healy Gallagher, Erin (TAX) <erin.healygallagher@usdoj.gov>

7/27/2020 2:26 PM

RE: stipulated motion to extend time to respond to rule 11 motion

To STEVEN PAUL <spaul@nsdplaw.com> Copy Denver Snuffer <denversnuffer@gmail.com> • Dan Garriott <dbgarrriott@msn.com> • Josh Egan <joshua.d.egan@gmail.com> • Ilevels <irevels@nsdplaw.com>

Steven,

As discussed, I'm not able to sign on the deadline you need. But you have my permission to say that the United States consents to the relief you request – filing your opposition on August 12.

Let me know if you need anything further.

Erin

From: STEVEN PAUL <spaul@nsdplaw.com>
Sent: Monday, July 27, 2020 4:04 PM
To: Healy Gallagher, Erin (TAX) <Erin.HealyGallagher@tax.USDOJ.gov>
Cc: Denver Snuffer <denversnuffer@gmail.com>; Dan Garriott <dbgarrriott@msn.com>; Josh Egan <joshua.d.egan@gmail.com>; Ilevels <irevels@nsdplaw.com>
Subject: stipulated motion to extend time to respond to rule 11 motion

Erin,

I'm sorry I didn't get this done sooner. Please review and confirm that I can file with your approval.

Steven Paul

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