

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE COMPLAINT)
OF SOUTH DAKOTA NETWORK, LLC,)
AGAINST SPRINT COMMUNICATIONS)
COMPANY LP)
)
IN THE MATTER OF THE THIRD)
PARTY COMPLAINT OF SPRINT)
COMMUNICATIONS COMPANY L.P.)
AGAINST SPLITROCK PROPERTIES,)
INC., NORTHERN VALLEY)
COMMUNICATIONS, INC., SANCOM,)
INC., AND CAPITAL TELEPHONE)
COMPANY)

DOCKET NUMBER TC 09-098

**AFFIDAVIT OF WILLIAM (BRET) LAWSON
IN SUPPORT OF SPRINT’S MOTION FOR PROTECTIVE ORDER REGARDING
NORTHERN VALLEY’S CORPORATE DEPOSITION NOTICE**

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

WILLIAM (BRET) LAWSON, being duly sworn under oath, states and alleges as follows:

1. I am an attorney for Sprint Communications Company L.P. (“Sprint”), and I am responsible for managing this and other litigation. Except as otherwise stated, I have personal knowledge of the matters contained in this Affidavit.


2. I make this Affidavit in support of Sprint’s Motion for Protective Order Regarding Northern Valley’s Corporate Deposition Notice. The purpose of this affidavit is to explain to the Commission the time and burden imposed on the Company by a corporate representative deposition notice that contains nearly 50 topics, many of which are on matters Sprint believes are not relevant to the claims and defenses in the case.

3. In carrying out my responsibilities on cases such as these, I am required to manage the process by which the Company responds to corporate representative deposition notices. This requires that I work with outside counsel and internal personnel to i) identify the person to provide the testimony on each topic, ii) identify the individuals who will have the knowledge of the company on each topic, iii) identify the documents that should be reviewed for the purpose of determining the knowledge of the company on the topic, iv) facilitate the testifying witness's internal investigation, v) facilitate and participate in deposition preparation with outside counsel, and vi) attend the deposition.

4. I have reviewed Northern Valley's Revised list of Deposition Topics and have begun to investigate items i), ii), and iii). If the list of topics is not narrowed, I believe Sprint will be required to designate 3-5 different witnesses, and that those witnesses will need to engage in internal investigations and review documents that have not previously been done for these kinds of cases.

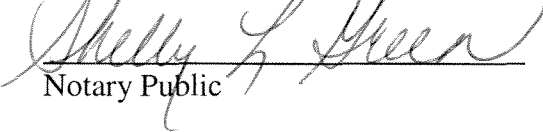
5. I do not know the total number of hours Sprint witnesses would expend, but I am aware that Regina Roach, Manager, Access Verification, who has served as a corporate representative witness in other cases, can spend up to two working days preparing for a single topic, and can spend two weeks preparing for a corporate representative deposition that includes a reasonable number of topics. This would not count hours spent by others who provide her information, my time spent on the tasks identified above, or prep time spent with outside counsel.

Affiant says nothing further.



William (Bret) Lawson

Subscribed and sworn to before me
this 17th day of April, 2012.



Notary Public

