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

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Docket No. TC10-026

SPRINT COMMUNICATIONS COMPANY L.P.,

SPRINT COMMUNICATIONS COMPANY L.P.'S MOTION TO COMPEL

Complainant,

v.

NATIVE AMERICAN TELECOM, LLC,

Respondent.

COMES NOW Sprint Communications Company L.P. ("Sprint"), by and through its attorney of record Stanley E. Whiting of Whiting Law Office, 142 E. 3rd Street Winner, SD 57580, Tom D. Tobin of Tobin Law Offices, PO Box 730, 422 Main Street Winner, SD 57580 and Philip R. Schenkenberg and Scott G. Knudson, Briggs and Morgan, P.A., 2200 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota 55402, pursuant to A.R.S.D. 20:10:01:22.01 and SDCL 15-6-37(a)(2) move to compel discovery responses from Native American Telecom, LLC ("NAT") for the following reasons:

NAT's discovery responses are more than two months late, in violation of the rules of civil procedure, the parties' agreement, and NAT's representations to the Commission as more specifically set forth in Sprint's Memorandum in Support of Its Motion to Compel filed contemporaneously herewith.

Dated: May 12, 2011

## **BRIGGS AND MORGAN, P.A.**

Scott G. Knudson Philip R. Schenkenberg

2200 IDS Center

Minneapolis, MN 55402

(612) 977-8400

## WHITING LAW OFFICE

Stanley E. Whiting 142 E. 3rd Street Winner, SD 57580 (605) 842-3373

## **TOBIN LAW OFFICES**

Tom D. Tobin PO Box 730 422 Main Street Winner, SD 57580 (605) 842-2500

Counsel for Sprint Communications Company, LP