

From: Peter Capossela [pcapossela@nu-world.com]
Sent: Wednesday, April 15, 2015 12:06 PM
To: William Taylor; James E. Moore
Subject: TransCanada discovery

Gentlemen,

I write to thank you in advance for your prospective compliance with the PUC's order denying part and granting part of the Standing Rock Sioux Tribe discovery motion. I enclose for your convenience the discovery requests originally served on January 6,

2015. The PUC order yesterday requires TransCanada to fully answer interrogatories 15-18 and requests for production 3-9 and 11-13. Compliance will involve delivery of the documents to the Standing Rock Sioux Tribe Administration Building in Fort Yates,

N.D. by 4:30 pm central time on April 17.

During our phone conference on February 24, I explained that I have been involved in document-intensive complex federal litigation, and understand that the production of documents can involve semi-trailers worth of materials. Bill estimated that TransCanada

has 4 or 5 semi-trailers worth of documents relating to the Tribe's requests. I understand that was an off-hand remark, but take you at your word, and the Tribe is planning for the delivery of a very high volume of documents by Friday afternoon. If for

any reason your understanding of TransCanada's obligations under the PUC order differs from the above, I appreciate your informing me of this. With the time constraints we are operating under, there is no time for games.

I appreciate your delivering the documents as they are kept in the ordinary course of business. The Tribe will promptly inspect, copy and return all documents, per S.D. Rule 34. I am available to discuss this matter as may be necessary. Thank you.

Peter Capossela

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