

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

IN THE MATTER OF THE COMPLAINT	)	
OF VENTURE COMMUNICATIONS	)	SD PUC DOCKET CT20-001
COOPERATIVE AGAINST AT&T	)	
MOBILITY	)	
	)	

**AT&T MOBILITY’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

COMES NOW, New Cingular Wireless PCS, LLC, dba AT&T Mobility (Mobility), by and through its attorney of record, William M. Van Camp, and makes and moves the Commission for a Partial Summary Judgment against Venture Communications Cooperation. In support of said Motion, Mobility offers the Commission a Statement of Undisputed Material Facts, Affidavit of Counsel and Memorandum in Support showing that there are no genuine issues of material fact and that Mobility is entitled to Summary Judgment as a matter of law. <sup>1</sup>

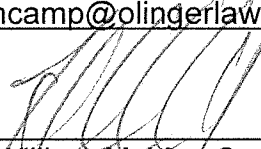
WHEREFORE, Mobility, pursuant to ARSD 20:10:01:01:02 and SDCL 15-6-56(b), prays for Partial Summary Judgment against Venture Communications Cooperative and requests the Commission to dismiss Venture Communications Cooperative’s Complaint filed in this matter and to award reasonable fees and costs for this action.

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<sup>1</sup> Mobility has requested from Venture written discovery. Though the discovery responses were due on May 17, 2021, they have not been received. Mobility reserves the right to amend or supplement its motion when the outstanding discovery responses from Venture have been received.

Dated this 19<sup>th</sup> day of May, 2021.

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By: William M. Van Camp  
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### CERTIFICATE OF SERVICE

William M. Van Camp hereby certifies that on the 19<sup>th</sup> day of May, 2021, he served the foregoing AT & T Mobility's Motion for Summary Judgment electronically with the Venture Communications Cooperative's counsel of record with copies of the same to the following persons electronically:

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William M. Van Camp