

Sabers, Cathy

From: Bill Taylor <bill.taylor@taylorlawsd.com>
Sent: Tuesday, May 21, 2019 4:11 PM
To: Sabers, Cathy
Cc: Kristen Edwards
Subject: Fall River v BH

***** This email is from an EXTERNAL sender *****

Use caution before responding. **DO NOT** open attachments or click links from unknown senders or unexpected email. If this email appears to be sent from a BHE employee or department, verify its authenticity before acting or responding. Report suspected phishing messages by forwarding them to **Report Phishing**. Contact the Helpdesk with questions.

Cathy, when we talked last week you proposed settling our discovery dispute by supplying certain categories of information related to avoided cost for SD Sun 1 and SD Sun 2 in exchange for Fall River agreeing not to pursue motions to compel on construction costs and the purchase price BH paid for the Global 174 interests. I passed that proposal on to my client. Mr. Vrba says he already has information for SD Sun 1 and 2 (as you surmised in our call) within the scope of what you proposed to supply. Accordingly, he declines your proposal.

Unless you have something further to propose, it appears we are at an impasse and I must make a motion to compel. If you have anything other ideas to resolve the issue, advise, otherwise I'll file a motion and get a hearing date.

Advise please.

William Taylor
Taylor Law Firm, LLC
4820 East 57th Street
Sioux Falls, South Dakota 57108
bill.taylor@taylorlawsd.com
605-212-1750 Cell
605-782-5304 Office
<http://www.taylorlawsd.com>

The information contained in this message is confidential, protected from disclosure and may be legally privileged. If you have received this communication in error, please notify the sender immediately by replying to this message and destroy the material in its entirety, whether in electronic or printed format.