

Carter, David

From: Schenkenberg, Philip [PSchenkenberg@Briggs.com]
Sent: Thursday, May 05, 2011 3:26 PM
To: Carter, David; Buntrock, Ross
Subject: RE: TC09-098: Northern Valley Communications, LLC's Supplemental Interrogatory Responses and Document Production

I'll pass it on, but I don't think we will agree to produce irrelevant information within spreadsheets. I think you guys did the same kind of redaction of board minutes. We haven't set a time for a call between the two parties.

Phil

Phil Schenkenberg
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From: Carter, David [mailto:Carter.David@ARENTFOX.COM]
Sent: Thursday, May 05, 2011 2:19 PM
To: Schenkenberg, Philip; Buntrock, Ross
Subject: RE: TC09-098: Northern Valley Communications, LLC's Supplemental Interrogatory Responses and Document Production

As a general matter, we would propose that the parties exchange native files. But, this would require Sprint to agree to produce their native spreadsheets as well and refrain from entering redactions when the spreadsheet contains "confidential" information (which is protected by the protective order), rather than privileged.

If this is amenable to Sprint, we should be able to finalize that when we have our conversation regarding the Sprint discovery responses. Have we agreed on a time for that call?

David Carter
Attorney

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From: Schenkenberg, Philip [mailto:PSchenkenberg@Briggs.com]
Sent: Thursday, May 05, 2011 10:53 AM
To: Carter, David; Buntrock, Ross
Subject: RE: TC09-098: Northern Valley Communications, LLC's Supplemental Interrogatory Responses and Document Production

What do you propose?

Phil Schenkenberg

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From: Carter, David [mailto:Carter.David@ARENTFOX.COM]
Sent: Thursday, May 05, 2011 9:51 AM
To: Schenkenberg, Philip; Buntrock, Ross
Subject: RE: TC09-098: Northern Valley Communications, LLC's Supplemental Interrogatory Responses and Document Production

Phil: We are glad to discuss that with you when we set up the call to discuss the issues related to Sprint's objections and are generally not opposed to exchanging the natives of spreadsheet files. In that regard, I believe that the production we made in the federal litigation, which you have now received, did include native spreadsheets.

However, when we received Sprint's initial production in the federal case, Sprint did not provide its native spreadsheet files, and, as I recall, its counsel in the federal case had implemented unnecessary redactions and then used those redactions as a basis for refusing to provide the natives. As such, we'll need to reach a mutual understanding on this issue that will be applicable to both parties.

Thanks,
David

David Carter
Attorney

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From: Schenkenberg, Philip [mailto:PSchenkenberg@Briggs.com]
Sent: Thursday, May 05, 2011 10:43 AM
To: Carter, David; Buntrock, Ross
Subject: RE: TC09-098: Northern Valley Communications, LLC's Supplemental Interrogatory Responses and Document Production

The disk you sent had pages from Excel spreadsheets. Would Northern Valley be so kind as to provide those in native format?

Phil

Phil Schenkenberg
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From: Carr, Edilma [mailto:Carr.Edilma@ARENTFOX.COM]

Sent: Thursday, April 28, 2011 5:51 PM

To: Schenkenberg, Philip

Cc: Carter, David; Buntrock, Ross

Subject: TC09-098: Northern Valley Communications, LLC's Supplemental Interrogatory Responses and Document Production

Dear Mr. Schenkenberg:

On behalf of David Carter, attached please find Northern Valley Communications, LLC's First Supplemental Responses to Sprint Communications Company L.P.'s First Set of Interrogatories.

Cd rom containing document production NVC00099410-NVC00100404 will follow via U.S. Mail.

Sincerely,

Edilma Carr
Legal Secretary

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