

EXHIBIT A

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE COMPLAINT OF)
SOUTH DAKOTA NETWORK, LLC,)
AGAINST SPRINT COMMUNICATIONS)
COMPANY LP)

TC 09-098

IN THE MATTER OF THE THIRD PARTY)
COMPLAINT OF SPRINT)
COMMUNICATIONS COMPANY LP)
AGAINST SPLITROCK PROPERTIES, INC.,)
NORTHERN VALLEY COMMUNICATIONS,)
INC., SANCOM, INC., AND CAPITAL)
TELEPHONE COMPANY)

**NOTICE OF TAKING DEPOSITION
OF THE CUSTODIAN OF
RECORDS OF SANG CAPITAL
GROUP, LLC**

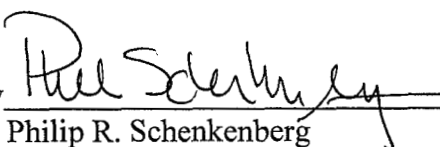
TO: Sang Capital Group, LLC, 505 Sweetwater Club Blvd., Longwood, FL 32779-2119:

PLEASE TAKE NOTICE that, pursuant to SDCL § 15-6-30(b)(6) and SDCL § 15-6-45(a), Sprint Communications Company L.P. (“Sprint”) will take the oral deposition of the Custodian of Records of Sang Capital Group, LLC on the 21st day of April, 2011, commencing at 9:00 a.m. at the Orlando Office Center, 1035 Primera Blvd., Suite 1041, Lake Mary, FL 32746.

The Custodian of Records shall be qualified to testify about the documents requested in the attached subpoena and the documents being produced. The deposition will continue as permitted by the South Dakota Rules of Civil Procedure. The deposition will be taken before a certified court reporter and will be recorded stenographically and/or by audio or audio-visual means.

Dated: March 14, 2011

BRIGGS AND MORGAN, P.A.

By  _____

Philip R. Schenkenberg
80 South Eighth Street
2200 IDS Center
Minneapolis, MN 55402
612.977.8400

Talbot J. Wiczorek
Gunderson, Palmer, Nelson & Ashmore, LLP
440 Mount Rushmore Road
Third Floor
P.O. Box 8045
Rapid City, SD 57701
605.342.1078

Attorneys for Sprint Communications Company
L.P.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE COMPLAINT OF)
SOUTH DAKOTA NETWORK, LLC,)
AGAINST SPRINT COMMUNICATIONS)
COMPANY LP)

TC 09-098

IN THE MATTER OF THE THIRD PARTY)
COMPLAINT OF SPRINT)
COMMUNICATIONS COMPANY LP)
AGAINST SPLITROCK PROPERTIES, INC.,)
NORTHERN VALLEY COMMUNICATIONS,)
INC., SANCOM, INC., AND CAPITAL)
TELEPHONE COMPANY.)

**SUBPOENA DUCES TECUM
FOR SANG CAPITAL GROUP, LLC**

TO: Sang Capital Group, LLC, 505 Sweetwater Club Blvd., Longwood, FL 32779-2119:

YOU ARE HEREBY COMMANDED pursuant to SDCL § 15-6-45(a) and SDCL § 15-6-45(b) to produce one or more officers, directors, or managing agents or other persons to testify on behalf of Sang Capital Group, LLC. The recipient of this subpoena duces tecum is required to make such a designation, pursuant to SDCL § 15-6-30(b)(6).

This deposition shall be taken by the counsel for Sprint Communications Company L.P. ("Sprint") at the Orlando Office Center, 1035 Primera Blvd., Suite 1041, Lake Mary, FL 32746, on the 21st day of April, 2011, at 9:00 a.m., before a qualified notary public, and thereafter by adjournment until the same shall be completed.

Pursuant to SDCL § 15-6-30(b)(6), Sang Capital Group, LLC is requested to designate and produce a person or persons for testimony on the following matters:

1. A custodian of Records qualified to testify about the documents requested in this subpoena and the documents being produced.

YOU ARE FURTHER COMMANDED, pursuant to SDCL § 15-6-45(b), to produce at the deposition, for inspection and copying, any and all documents described in Exhibit A hereto.

ISSUED in the name of the Clerk of the Seminole County Court this ____ day of March,
2011.

(SEAL)

EXHIBIT A

DOCUMENTS TO BE PRODUCED BY CUSTODIAN OF RECORDS OF SANG CAPITAL GROUP, LLC PURSUANT TO SUBPOENA REQUESTED BY SPRINT COMMUNICATIONS COMPANY L.P. FOR SDCL § 15-6-45(a) AND SDCL § 15-6-45(b) DEPOSITION

Definitions

“**Document**” means all written, printed, typed, punched, taped, filed, or graphic matter, however produced, reproduced or stored, of every kind and description, now or formerly in your actual or constructive possession, custody, trust, care, or control, including but not limited to: correspondence (such as letters, e-mail, faxes, cables, and telegrams); notes; memoranda (including memoranda of conversations, conferences, and telephone conversations); reports; data compilation or analyses; logs and records; photographs, books; papers, manuals; handbooks; bulletins; advisories; messages; magazines; periodicals; film strips or movies; press releases; newspaper clippings; pamphlets, studies; notations; working papers; charts; graphs; plans; drawings; diagrams; computer printouts; indexes; minutes; transcripts; contracts; agreements; leases; legal pleading; invoices; billings; statements; accounting books or records; financial data of any kind; journals; ledgers; diaries; tax returns; bylaws; rules; regulations; constitution; annual reports; programs; certifications; resolutions; any electronic or any other records of any kind or nature and any mechanical or electronic sound or recordings or transcripts thereof; computer files; data faxes; and all copies or facsimiles of documents by whatever means made. *All electronically stored information shall be produced in the following formats: in general, in searchable .pdf form, but for spreadsheets and data files, which should be produced in their native formats.*

“**You,**” “**your**” or “**yours**” means Sang Capital Group, LLC, and its predecessors and assigns and includes, without limitation, its officers, directors, employees, agents, consultants, attorneys, corporate subsidiaries and affiliates.

“**Northern Valley**” means Northern Valley Communications, LLC or its parent company James Valley Communications, Inc.

“**Person**” means any and all natural persons, corporations, businesses, firms, companies, partnerships, unincorporated associations, governmental or public agencies, joint ventures and all other entities, including, without limitations, all employees, representatives, consultants and agents of any of the foregoing.

“**Correspondence**” means any written communication, including but not limited to, emails and letters exchanged by U.S. Mail, overnight mail, facsimile or any other transmission method.

“**Relate**” or “**relating**” means regards, connects to, supports, evidences, describes, mentions, refers to, contradicts, comprises, or to be associated with.

The words “**any**” and “**all**” shall be considered to include each and every.

The singular of any word shall include the plural and the plural of any word shall include the singular.

All of the documents sought seek materials from January 1, 2006 to the present unless specifically stated otherwise.

DOCUMENTS TO PRODUCE

1. Provide all documents evidencing communications (including but not limited to correspondence or other documentation exchanged) between you and Northern Valley or any person that helped you to connect Northern Valley to you or equipment you used.

2. Provide all contracts, agreements or other documentation of understandings or arrangements between you and Northern Valley, or any person that helped you to connect Northern Valley to you or equipment you used.
3. Provide all documents relating to any contracts, agreements, or other documentation of understandings or arrangements responsive to the above request.
4. Provide all documents that evidence the volume of traffic that has been routed or delivered to you from Northern Valley.
5. Provide all documents relating to the equipment you, your clients or parties with whom you have contracted have deployed that allows for conference calling, chat lines, podcasts, voice mail, international calling services or any other services that you offered for telephone numbers that Northern Valley assigned to you. This should include, but not be limited to documents relating to:
 - a. The type of equipment deployed;
 - b. The location of the deployed equipment;
 - c. How the equipment operates;
 - d. How calls are routed to or from any portion or components of the equipment; and
 - e. When this equipment was deployed.
6. Provide all documents relating to the revenues you have received from Northern Valley, or any person that helped you to connect Northern Valley to you or equipment you used.
7. Provide all documents relating to the monies you have paid to Northern Valley or any person that helped you to connect Northern Valley to you or equipment you used.
8. Provide all documents relating to the telephone numbers assigned to you by Northern Valley, or any person that helped you to connect Northern Valley to you or equipment you used.

9. Provide your advertisements, web pages, promotional materials or other marketing materials related to services you provide to those calling numbers Northern Valley has assigned to you, regardless of when created, used, or effective.
10. Provide your certificate or other authorization to (a) conduct business or (b) provide telecommunications services in the state of South Dakota.
11. Provide all invoices or bills or documents related to invoices or bills that you have received from Northern Valley or any person that helped you to connect Northern Valley to you or equipment you used.
12. Provide all documents relating to the rates, terms and conditions under which you obtain any services from Northern Valley.