

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN RE:

Docket No. TC10-026

SPRINT COMMUNICATIONS
COMPANY L.P.,

Complainant,

v.

NATIVE AMERICAN TELECOM, LLC,

Respondent.

**SPRINT COMMUNICATIONS
COMPANY L.P.'S MOTION
TO COMPEL NAT TO HONOR
ITS AGREEMENT TO ANSWER
DISCOVERY**

COMES NOW, Sprint Communications Company L.P. ("Sprint"), by and through counsel of record, Scott G. Knudson and Philip R. Schenkenberg, Briggs and Morgan, P.A., 80 South 8th Street, 2200 IDS Center, Minneapolis, Minnesota, and pursuant to ARSD 20:10:01:01.02 and SDCL § 15-6-26(a) and § 15-6-37(a), hereby files its Motion to Compel NAT to Honor its Agreement to Answer Discovery against Native American Telecom, LLC ("NAT").

As detailed fully in the accompanying memorandum, NAT has failed to provide substantive responses to several of Sprint's discovery requests despite its representation on the record before the Commission that it would do so.

In addition, because NAT's discovery tactics are unreasonable and have served only to needlessly increase Sprint's time and expenses to obtain discovery, NAT should be required to pay Sprint fees and costs for this motion. ARSD 20:10:01:01.02; SDCL § 15-6-37(a)(4)(A).

Dated: April 11, 2012.

BRIGGS AND MORGAN, P.A.

By s/Scott G. Knudson

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