



4. During our meet-and-confer call, we also discussed the application of the South Dakota Rules to expert discovery like that sought of Mr. Farrar. Mr. Shultz acknowledged that the rules allow expert depositions only by motion and subject to cost shifting, but re-served NAT's deposition without bringing motion and without arranging for compensation.

5. Sprint served NAT with Amended Responses to NAT's Data Requests 1.34-1.36 on April 13, 2012. A true and correct copy of these responses is attached as **Exhibit B**.

6. Bruce R. Tillotson, billing analyst for Sprint, executed an affidavit on March 12, 2012, which was submitted to this Commission in opposition to NAT's 2012 Motion to Compel. A true and correct copy of this affidavit is attached as **Exhibit C**.

7. Karine M. Hellwig, manager of regulatory reporting for Sprint, executed an affidavit on February 22, 2012, which was submitted to this Commission in opposition to NAT's 2012 Motion to Compel. A true and correct copy of this affidavit is attached as **Exhibit D**.

AFFIANT SAYS NOTHING FURTHER.

*s/Philip R. Schenkenberg*  
Philip R. Schenkenberg

Subscribed and sworn to before me  
this 20th day of August, 2013.

*Sheryl M. O'Neill*  
Notary Public  
My commission expires: 1-31-2015