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**From:** [scott@swierlaw.com](mailto:scott@swierlaw.com) [mailto:[scott@swierlaw.com](mailto:scott@swierlaw.com)]

**Sent:** Wednesday, March 21, 2012 11:06 AM

**To:** Lundy, Todd

**Subject:** RE: SDPUC TC 11-087 -- NAT'S DISCOVERY RESPONSES/OBJECTIONS (CENTURYLINK - SECOND SET)

Todd:

Thanks for your below email.

Please clarify what "documents, data, and other information" CenturyLink is seeking in Data Requests 2.1 and 2.2

The information encompassed by these Data Request could include Mr. Roesel's college textbooks, continuing education materials, etc.

Please advise.

Scott

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----- Original Message -----

Subject: RE: SDPUC TC 11-087 -- NAT'S DISCOVERY RESPONSES/OBJECTIONS  
(CENTURYLINK - SECOND SET)

From: "Lundy, Todd" <[Todd.Lundy@CenturyLink.com](mailto:Todd.Lundy@CenturyLink.com)>

Date: Mon, March 19, 2012 1:11 pm

To: "[scott@swierlaw.com](mailto:scott@swierlaw.com)" <[scott@swierlaw.com](mailto:scott@swierlaw.com)>, "Schenkenberg,  
Philip" <[PSchenkenberg@Briggs.com](mailto:PSchenkenberg@Briggs.com)>, Meredith Moore

<meredithm@cutlerlawfirm.com>, Rich Coit  
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<cwmadsen@bgpw.com>, "bvancamp@olingerlaw.net"  
<bvancamp@olingerlaw.net>, "Knudson, Scott"  
<SKnudson@Briggs.com>, Ryan Taylor <ryant@cutlerlawfirm.com>,  
"Topp, Jason" <Jason.Topp@CenturyLink.com>, "Thomas Welk"  
<tjwelk@bgpw.com>, "chris.daugaard@state.sd.us"  
<chris.daugaard@state.sd.us>, "Stanley Whiting"  
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<diane.c.browning@sprint.com>, "Patty VanGerpen"  
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<DPRogers@riterlaw.com>, "david.jacobson@state.sd.us"  
<david.jacobson@state.sd.us>, "tobinlaw@gwtc.net"  
<tobinlaw@gwtc.net>, William Lawson <Bret.Lawson@sprint.com>

Scott, I have received and reviewed NAT's responses to CenturyLink's second set of discovery requests, which, in sum, asks for information reviewed by NAT's consultant, Mr. Roesel, in the preparation of his testimony. Your responses to 2.1, 2.2, and 2.3 are that they are outside the scope of this case. I fail to see how a question of what an expert has reviewed in preparation of testimony that has actually been filed in the case could be outside its scope. Please let me and the others know how it is that the information reviewed in preparation of an expert's testimony filed in a docket could be outside the docket.

Further, you object on the grounds that use of the words "facts, data, and other information" is vague. I also fail to see how that objection is sustainable. In short, CenturyLink wants to know what Mr. Roesel reviewed and analyzed, and such language was intended to provide detail of what is being requested.

Thanks.

Todd Lundy  
CenturyLink Law Department  
1801 California, #1000  
Denver, CO 80202  
Work: 303-992-2510  
Fax: 303-295-7069  
Cell: 303-587-4820  
Email: [todd.lundy@qwest.com](mailto:todd.lundy@qwest.com)

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**From:** [scott@swierlaw.com](mailto:scott@swierlaw.com) [<mailto:scott@swierlaw.com>]

**Sent:** Monday, March 19, 2012 8:13 AM

**To:** Schenkenberg, Philip; Meredith Moore; Rich Coit; Lundy, Todd; [Karen.Cremer@state.sd.us](mailto:Karen.Cremer@state.sd.us); [cwmadsen@bgpw.com](mailto:cwmadsen@bgpw.com); [bvancamp@olingerlaw.net](mailto:bvancamp@olingerlaw.net); Knudson, Scott; Ryan Taylor; Topp, Jason; 'Thomas Welk'; [chris.daugaard@state.sd.us](mailto:chris.daugaard@state.sd.us); 'Stanley Whiting'; 'Jeff Holoubek'; 'Diane Browning'; 'Patty VanGerpen'; [M.Northrup@riterlaw.com](mailto:M.Northrup@riterlaw.com); [DPRogers@riterlaw.com](mailto:DPRogers@riterlaw.com); [david.jacobson@state.sd.us](mailto:david.jacobson@state.sd.us); [tobinlaw@gwtc.net](mailto:tobinlaw@gwtc.net); William Lawson

**Subject:** SDPUC TC 11-087 -- NAT'S DISCOVERY RESPONSES/OBJECTIONS (CENTURYLINK - SECOND SET)

Counsel:

Attached please find NAT's Responses/Objections to CenturyLink's Second Set of Discovery Requests.

Scott

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----- Original Message -----

Subject: RE: SDPUC TC 11-087 -- NAT'S DISCOVERY RESPONSES/OBJECTIONS (MIDSTATE/SDTA)

From: <[scott@swierlaw.com](mailto:scott@swierlaw.com)>

Date: Fri, March 09, 2012 4:35 pm

To: "Schenkenberg, Philip" <[PSchenkenberg@Briggs.com](mailto:PSchenkenberg@Briggs.com)>, "Meredith Moore" <[meredithm@cutlerlawfirm.com](mailto:meredithm@cutlerlawfirm.com)>, "Rich Coit" <[richcoit@sdtaonline.com](mailto:richcoit@sdtaonline.com)>, "Lundy, Todd"

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Jason" <[Jason.Topp@CenturyLink.com](mailto:Jason.Topp@CenturyLink.com)>, "Thomas Welk"

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"Jeff Holoubek" <[jeff@nativeamericantelecom.com](mailto:jeff@nativeamericantelecom.com)>, "Diane Browning"

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<[M.Northrup@riterlaw.com](mailto:M.Northrup@riterlaw.com)>, "[DPRogers@riterlaw.com](mailto:DPRogers@riterlaw.com)"

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<[david.jacobson@state.sd.us](mailto:david.jacobson@state.sd.us)>, "[tobinlaw@gwtc.net](mailto:tobinlaw@gwtc.net)" <[tobinlaw@gwtc.net](mailto:tobinlaw@gwtc.net)> ,

"William Lawson" <[Bret.Lawson@sprint.com](mailto:Bret.Lawson@sprint.com)>

Counsel:

Attached please find NAT's Responses/Objections to Midstate's/SDTA's discovery requests.

Thank you.

Scott

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----- Original Message -----

Subject: SDPUC TC 11-087 -- NAT'S DISCOVERY RESPONSES/OBJECTIONS  
(SPRINT & CENTURYLINKS)

From: <[scott@swierlaw.com](mailto:scott@swierlaw.com)>

Date: Fri, March 09, 2012 4:25 pm

To: "Schenkenberg, Philip" <[PSchenkenberg@Briggs.com](mailto:PSchenkenberg@Briggs.com)>, "Meredith Moore" <[meredithm@cutlerlawfirm.com](mailto:meredithm@cutlerlawfirm.com)>, "Rich Coit" <[richcoit@sdtaonline.com](mailto:richcoit@sdtaonline.com)>, "Lundy, Todd" <[Todd.Lundy@CenturyLink.com](mailto:Todd.Lundy@CenturyLink.com)>, "Karen.Cremer@state.sd.us" <[Karen.Cremer@state.sd.us](mailto:Karen.Cremer@state.sd.us)>, "[cwmadsen@bgpw.com](mailto:cwmadsen@bgpw.com)" <[cwmadsen@bgpw.com](mailto:cwmadsen@bgpw.com)>, "[bvancamp@olingerlaw.net](mailto:bvancamp@olingerlaw.net)" <[bvancamp@olingerlaw.net](mailto:bvancamp@olingerlaw.net)>, "Knudson, Scott" <[SKnudson@Briggs.com](mailto:SKnudson@Briggs.com)>, "Ryan Taylor" <[ryant@cutlerlawfirm.com](mailto:ryant@cutlerlawfirm.com)>, "Topp, Jason" <[Jason.Topp@CenturyLink.com](mailto:Jason.Topp@CenturyLink.com)>, "Thomas Welk" <[tjwelk@bgpw.com](mailto:tjwelk@bgpw.com)>, "[chris.daugaard@state.sd.us](mailto:chris.daugaard@state.sd.us)" <[chris.daugaard@state.sd.us](mailto:chris.daugaard@state.sd.us)>, "Stanley Whiting" <[swhiting@gwtc.net](mailto:swhiting@gwtc.net)>, "Jeff Holoubek" <[jeff@nativeamericantelecom.com](mailto:jeff@nativeamericantelecom.com)>, "Diane Browning" <[diane.c.browning@sprint.com](mailto:diane.c.browning@sprint.com)>, "Patty VanGerpen" <[patty.vangerpen@state.sd.us](mailto:patty.vangerpen@state.sd.us)>, "[M.Northrup@riterlaw.com](mailto:M.Northrup@riterlaw.com)" <[M.Northrup@riterlaw.com](mailto:M.Northrup@riterlaw.com)>, "[DPRogers@riterlaw.com](mailto:DPRogers@riterlaw.com)" <[DPRogers@riterlaw.com](mailto:DPRogers@riterlaw.com)>, "[david.jacobson@state.sd.us](mailto:david.jacobson@state.sd.us)" <[david.jacobson@state.sd.us](mailto:david.jacobson@state.sd.us)>, "[tobinlaw@gwtc.net](mailto:tobinlaw@gwtc.net)" <[tobinlaw@gwtc.net](mailto:tobinlaw@gwtc.net)>, "William Lawson" <[Bret.Lawson@sprint.com](mailto:Bret.Lawson@sprint.com)>

Counsel:

Attached please find NAT's Responses/Objections to Sprint's and CenturyLink's discovery requests.

Thank you.

Scott

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