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AWA Goodhue, LLC

Docket Nos.: MPUC Docket No. IP6701/WS-08-1233 and OAH Docket 3-2500-21662-2

Response To: Patrick Hynes, Belle Creek Township Information Request No. 3

Date Received: February 14, 2011 Response Date: February 25, 2011

GENERAL OBJECTIONS

1. AWA Goodhue objects to each information request to the extent that it seeks information that is subject to the attorney-client privilege, work product privilege or other privilege on the ground that privileged matter is exempt from discovery.

2. AWA Goodhue objects to any and all instructions or definitions beyond the requirements imposed or permitted by the Minnesota Rules of Civil Procedure or Minnesota Rules Parts 1400 and 1405.

3. AWA Goodhue does not waive any of their general or particular objections in the event it furnishes information or documents coming within the scope of any such objections.

Without waiving the foregoing general objections, and pursuant to the Minnesota Rules of Civil Procedure and Minnesota Rules Parts 1400 and 1405, AWA Goodhue has enclosed responses to Belle Creek Township IR No. 3.

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| 3. | <p>1. Page 7, Lines 14-15 of the Ward Testimony refer to “my discussions with County Commissioners Samuelson and Rechtzigel...” Please identify each and every discussion that Mr. Ward had with Commissioner Samuelson and Commissioner Rechtzigel, and for every discussion identified, please state the following:</p> <p style="margin-left: 20px;">a. The date, time, and location of the discussion;</p> <p style="margin-left: 20px;">Response: Mr. Ward met with Commissioner Samuelson midday on November 9, 2010, at the Cannon Ball Restaurant and with Commissioner Rechtzigel at 3 p.m. on November 9, 2010, at the Kenyon Middle/High School.</p> <p style="margin-left: 20px;">b. Whether the discussion was in person or over the telephone;</p> <p style="margin-left: 20px;">Response: Both meetings were in person.</p> <p style="margin-left: 20px;">c. All persons present at the discussions; and</p> <p style="margin-left: 20px;">Response: Mark Ward, Ben Kerl, Chuck Burdick and Cory Buckingham were present at both meetings.</p> <p style="margin-left: 20px;">d. The subject matter of the discussion.</p> <p style="margin-left: 20px;">Response: The meetings were scheduled to discuss a possible compromise with the County in advance of the MPUC hearing for reconsideration.</p> |
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Response by: <u>Mark Ward</u>	List sources of information: _____
Title: <u>Chief Manager</u>	_____
Company: <u>AWA Goodhue, LLC</u>	_____
Telephone: _____	_____

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3.	<p>2. For each discussion identified in Request No. 1, please produce all documents in the possession of Mark Ward and/or AWA Goodhue that evidence, refer to, or relate in any way to the discussion.</p> <p>Response: AWA Goodhue objects to this information request to the extent it seeks information that is protected by the attorney-client privilege or work product protection. Without waiving the foregoing objection, AWA Goodhue states that it has already produced all non-privileged, responsive documents in response to Belle Creek IR No. 1.</p>

Response by: Mark Ward

List sources of information: _____

Title: Chief Manager

Company: AWA Goodhue, LLC

Telephone: _____