

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022
DOCKET: UT-181051
REQUESTER: CenturyLink

WITNESS: Commission Staff
RESPONDER: Commission Staff

CENTURYLINK DATA REQUEST NO. 22:

Identify and describe all of Mr. Akl's litigation or consulting engagements involving DTN, DTN-X or Dense Wavelength Division Multiplex (DWDM) networks. For all such litigation or consulting engagements, produce copies of all of Mr. Akl's written testimonies, deposition transcripts and expert reports.

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects on the basis that the material sought by the request is: (a) not in Staff's possession, custody, or control; (b) already in the Company's possession, custody, or control; (c) publicly available; and/or (d) obtainable from some other source that is more convenient, less burdensome, or less expensive. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects to the extent that this request would improperly require the creation of new data and/or documents on the part of Staff. *See* WAC 480-07-400(1)(c)(iii). Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to this request to the extent it seeks the confidential, copyrighted, and/or privileged information of third parties. Staff further objects to this request to the extent that it is beyond the scope of Dr. Akl's testimony.

Without waving the above objections, Staff responds as follows:

Dr. Akl's experience is in his CV (Akl, Exh. RA-2). Copies of all of Dr. Akl's written testimonies, deposition transcripts, and expert reports are either available publicly from the Courts or filed under seal and confidential.