

From: Anthony McNamer [mailto:anthony@mcnamerlaw.com]
Sent: Wednesday, June 16, 2010 4:45 PM
To: Torem, Adam (UTC)
Cc: UTC DL Records Center; Lisa Anderl; Joseph Dicks; Deborah Gumm; Todd Lesser; Jeff Nodland
Subject: Re: In the Matter of Quest Corporation's Petition for Arbitration; Docket UT-093035; NCC's Motion to Compel

Judge Torem:

Given that we just received Qwest's response and our responsive testimony is due tomorrow, we wanted to get this on the record prior to the time our responsive testimony was due, so that Qwest could not claim that North County was simply using the motion to compel as an excuse not to provide responsive testimony or that North County had somehow waived its right to request supplemental responsive testimony. North County is prepared to file its responsive testimony tomorrow (except to the extent the testimony relates to the information Qwest has refused to provide).

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On Jun 16, 2010, at 4:17 PM, Anderl, Lisa wrote:

Judge Torem:

Qwest opposes NCC's motion to compel, opposes NCC's request for a continuance or for leave to file supplemental testimony, and notes that NCC has failed to comply with [WAC 480-07-425\(1\)](#), which requires parties to attempt to informally resolve discovery disputes prior to bringing the dispute to the Commission. Qwest will file this response with the records center in hard copy on June 17, 2010, and will respond to the motion to compel within five (5) business day, or as otherwise ordered by the Administrative Law Judge.

Thank you.

Lisa Anderl
206-345-1574

From: Anthony McNamer [<mailto:anthony@mcnamerlaw.com>]
Sent: Wednesday, June 16, 2010 3:59 PM
To: records@utc.wa.gov

Cc: atorem@utc.wa.gov; Anderl, Lisa; Joseph Dicks; Deborah Gumm; Anthony McNamer; Todd Lesser
Subject: In the Matter of Quest Corporation's Petition for Arbitration; Docket UT-093035; NCC's Motion to Compel

Attached please find North County's Motion to Compel and Enclosure (Qwest's Responses to NCC's First Data Request).

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