

DATA REQUEST RESPONSE

Case Description: Tel West Communications, LLC, Petition for Enforcement of its Interconnection Agreement with Qwest
Docket No.: UT-013097
State: Washington
Requesting Party: Qwest Communications
Responding Party: TEL WEST Communications, LLC

Qwest-074: Please produce all documents relating in any respect to Ms. Hild's independent contractor relationship with Tel West, including, but not limited to, written agreements, correspondence, memoranda, invoices, billing statements and check stubs.

Response: Tel West objects because this question is overly broad and not likely to lead to the discovery of admissible evidence.

Without waiving this objection, Tel West refers Qwest to the Response to Qwest-073.

Respondent: Jeff Swickard

Supplemental Request (May 3, 2002)

Qwest-074: The data request asked Tel West to produce all documents relating in any respect to Ms. Hild's independent contractor relationship with Tel West. The only document Tel West provided was her Expert Witness Agreement. Please clarify whether that was the only document (as that term is broadly defined) in Tel West's possession as of the date it was served with Qwest's Fourth Data Requests or at any time thereafter. If it is not, please produce all other responsive documents.

Supplemental Response (May 10, 2002)

Tel West refers Qwest to its original objection.

Respondent: Jeff Swickard