



Adam Sherr
05/24/2002 01:29 PM

To: rice@millernash.com
cc:

Subject: Re: Tel West's supplemental response to Qwest-074

One correction/clarification - the confirmation I am seeking is that the documents attached to today's supplemental response constitute all responsive documents in Tel West's possession at any time on or since April 22 (not May 3), the date Qwest served its Fourth Data Requests on Tel West.

----- Forwarded by Adam Sherr/DNVRULNS12/USWEST/US on 05/24/2002 01:23 PM -----

Adam Sherr



Adam Sherr
05/24/2002 01:22 PM

To: rice@millernash.com
cc: harlow@millernash.com, Lisa Anderl/DNVRULNS12/USWEST/US@USWEST

Subject: Tel West's supplemental response to Qwest-074

David:

Thank you for getting me the supplemental response by 1:00 pm, as promised. One more question. My May 3 supplemental request asked for all documents "in Tel West's possession as of the date it was served with Qwest's Fourth Data Requests or at any time thereafter." Tel West's May 24 supplemental response states that it is attaching "all the documents [presently] in Tel West's possession that respond to this data request."

Please confirm or have Mr. Swickard confirm that the documents attached to today's supplemental response constitute all responsive documents in Tel West's possession at any time on or since May 3. Obviously, I am seeking assurance from your client that it did not possess and somehow discard responsive documents between May 3 and today. Assuming I get that confirmation, I see no reason to proceed with the motion to compel. Thank you.

Adam
206-398-2507

EXHIBIT E