

"Sherr, Adam"
<Adam.Sherr@qwest.com>

06/29/2004 12:59 PM

To "Chris Swanson" <CSwanson@wutc.wa.gov>
cc

Subject RE: DRs 2 - 122 Unfiled Agreements UT-033011

Thank you, sir.

-----Original Message-----

From: Chris Swanson [mailto:CSwanson@wutc.wa.gov]
Sent: Tuesday, June 29, 2004 12:58 PM
To: Sherr, Adam
Subject: RE: DRs 2 - 122 Unfiled Agreements UT-033011

Adam,

Staff agrees to identify its objections by July 6. We will also attempt to get all our answers to you by the same date and no later than July 12. Thanks.

Chris Swanson, Assistant Attorney General
Office of Attorney General of Washington
Utilities and Transportation Division
PO Box 40128
Olympia, Washington 98504-0128
(360) 664-1220
cswanson@wutc.wa.gov
chriss3@atg.wa.gov

"Sherr, Adam"

<Adam.Sherr@qwest.com>

To "Chris Swanson" <CSwanson@wutc.wa.gov>

06/28/2004 05:15 PM

cc

Subject RE: DRs 2 - 122 Unfiled Agreements UT-033011

Chris -- A one week extension is reasonable given the number of requests, but it may put us in a pinch if the responses we get on July 12 are incomplete. Tom Wilson's deposition is on July 21, and we will need time to review the responses in connection with our preparation for the deposition. Also, if Staff refuses to answer any of the DRs, we will want sufficient time to pursue a motion to compel so that we can get responses prior to the deposition. I'm not expecting this to be the

case, but of course it's my job to make sure we have adequate time to prepare.

To that end, Qwest will agree to a one week extension on the condition that, on or before July 6 (the 5th being a holiday), Staff (a) identifies any requests it will object to without substantively answering, and (b) provides its full objections to those particular requests.

-----Original Message-----

From: Chris Swanson [mailto:CSwanson@wutc.wa.gov]
Sent: Monday, June 28, 2004 1:41 PM
To: Sherr, Adam
Subject: DRs 2 - 122 Unfiled Agreements UT-033011

Hi, Adam. We discussed the possibility of extending the deadline for Staff to respond to the above DRs. Staff requests an extension until July 12 to respond. Please let me know if Qwest agrees with this extension.

Chris Swanson, Assistant Attorney General
Office of Attorney General of Washington
Utilities and Transportation Division
PO Box 40128
Olympia, Washington 98504-0128
(360) 664-1220
cswanson@wutc.wa.gov
chriss3@atg.wa.gov