

DATE PREPARED: November 4, 2022 DOCKET: TG-220243-220215 REQUESTER: Basin Disposal, Inc.	WITNESS: Brian Wilhelm Responder: Packaging Corporation of America
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DATA REQUEST NO. 5:

Produce all Communications and any records relating to Communications, including without limitation calendar invitations, between PCA and JEI relating in any way to the current dockets or the issues raised therein from March 29, 2022 to the present.

RESPONSE:

Objection. PCA objects to BDI Data Request 5 as overbroad and unduly burdensome and to the extent it requests Communications protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or doctrine. Without waiving that objection and subject thereto, PCA will produce responsive documents that are not protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or doctrine. For documents responsive to this Data Request, please see the PDF titled “PCA Responsive Documents to DR 3.”

PCA reserves the right to supplement or amend its response.

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