

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

SANDRA JUDD, et al.,

Complainants,

v.

AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC.; and  
T-NETIX, INC.,

Respondents.

DOCKET NO. UT-042022

ERRATUM - CORRECTED EXHIBIT F  
TO COMPLAINANTS' REPLY  
MEMORANDUM IN FURTHER  
SUPPORT OF THEIR MOTION TO  
COMPEL

The incorrect page was inadvertently submitted as Exhibit F to Complainants' Reply Memo in Further Support of Their Motion to Compel. The correct Exhibit F is attached.

DATED: December 24, 2008.

SIRIANNI YOUTZ  
MEIER & SPOONEMORE

/s/ Chris R. Youtz

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## CERTIFICATE OF SERVICE

I certify, under penalty of perjury and in accordance with the laws of the State of Washington, that on December 24, 2008, I served a copy of the foregoing document on all counsel of record in the manner shown and at the addresses listed below:

Letty S. D. Friesen AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST 2535 E. 40 <sup>th</sup> Avenue, Suite B1201 Denver, CO 80205 Attorneys for Respondent AT&T	[x] By Email <a href="mailto:lsfriesen@att.com">lsfriesen@att.com</a> [x] By United States Mail
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Marguerite E. Russell Administrative Law Judge 1300 S. Evergreen Park Drive SW P.O. Box 47250 Olympia, WA 98504-7250	[x] By Email <a href="mailto:mrussell@utc.wa.gov">mrussell@utc.wa.gov</a>

DATED: December 24, 2008, at Seattle, Washington.

/s/ Jean Fallow

# **Exhibit F**

**WASHINGTON UTILITIES & TRANSPORTATION COMMISSION  
RESPONSES TO SECOND DATA REQUESTS**

Docket No.: UT-042022  
Response Date: November 17, 2008  
Requestor: Complainants  
Respondent: T-Netix, Inc.  
Prepared by: Joseph Ferretti

Complainants' Amended Second Data Request No.16: Please produce all documents that relate to the negotiation, interpretation, implementation, or performance of any CONTRACTS or SUBCONTRACTS in which T-NETIX is a party and which relate to INMATE-INITIATED CALLS.

T-Netix's Response to Amended Second Data Request No.16:

T-Netix objects to this Request on the ground that the term "INMATE INITIATED CALLS" improperly refers to calls made from "June 20, 1996 to the present" rather than from June 20, 1996 through December 31, 2000. According to telephone records that Complainants produced in response to T-Netix First Data Request No. 2, the latest month during which complainants received inmate collect calls for which they allege no prerecorded rate information was provided is November 2000. Therefore, the Request is overly broad, unduly burdensome and expensive, oppressive, and not relevant or reasonably calculated to lead to the discovery of admissible evidence.

T-Netix further objects to this Request on the ground that the term "INMATE INITIATED CALLS" improperly refers to calls initiated by Washington inmates rather than inmates at the three facilities at issue in this litigation. Therefore, the Request is overly broad, unduly burdensome and expensive, oppressive, and not relevant or reasonably calculated to lead to the discovery of admissible evidence.

T-Netix in addition objects to this Request because the terms "negotiation, interpretation, implementation, or performance" are so overly broad, and unduly burdensome as to render it impossible to respond to the Request within any reasonable period of time. Every document already produced and every document produced in response to these Amended Data Requests would arguably be responsive to this Request, as phrased.

T-Netix's First Supplemental Response to Amended Second Data Request No. 16:

Complainants have now identified a fourth institution as originating the inmate collect calls at issue in this proceeding. As a result, T-Netix withdraws its objection to this Request as to that institution.

Subject to and without waiving any objection stated herein, T-Netix has no additional responsive documents to provide at this time but will produce all responsive documents, if any, that it discovers in its search for documents responsive to other, more narrowly-tailored data requests that may be promulgated by Complainants.