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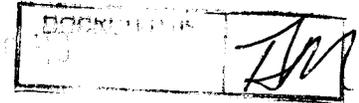
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BEFORE THE ARIZONA CORPORATION COMMISSION

J. ALAN SMITH,  
Complainant,  
v.  
PAYSON WATER CO., INC./BROOKE  
UTILITIES, INC.,  
Respondent.

NO. W-03514A-12-0007

MOTION TO COMPEL  
RESPONSES TO DATA  
REQUESTS AND SUBPOENAS  
DUCES TECUM

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Complainant, through undersigned counsel, hereby moves this tribunal for an order compelling Respondent to provide documents in response to the Subpoenas served upon him in this matter. In addition, Complainant seeks an order requiring Respondent to respond to Complainant's First Set of Data Requests. Despite the volume of information requested, Respondent has provided not a single document in response to either the Subpoenas or the Data Requests.

Respondent has been served with two Subpoenas compelling the production of the documents. The first, dated August 2, 2012, required Respondent to produce the following documents:

- 1. Any and all copies of the Books, papers, documents or other tangible things, Accounts, Water Hauling Invoices, Water Hauling Logs, Bills of Lading, Waybills and other documents un-edited and un-altered that have been billed to Brooke Utilities, Inc. and Payson Water Co. Inc. P. O. Box 8218; Bakersfield, CA 93380 according to Invoices issued by **Pearson Water Co.** for the hauling of water to the Water Systems of Mesa del Caballo, East Verde

1 Park and any other Water System owned and operated by Payson Water Co.  
2 during Water Augmentation period May 1, 2011 through October 31, 2011  
3 inclusive of those billing periods and all those Water Hauling Invoices, Water  
4 Hauling Logs, Bills of Lading, Waybills and other documents associated  
5 therewith and described herein, including but not limited to the following:

- 6 a. Invoice Numbers 8803, 8804, 8805, 8806, 8807, 8808, 8809, 8810, 8811,  
7 8812, 8813, 8814, 8815, 8816, 8817, 8818, 8819, 8820, 8821, 8822, 8823,  
8 8824 and 8825 and any and all of the BUI HAULING LOGS and your  
9 records associated with these invoices. They shall be copies of the originals  
10 un-altered and un-edited in any way;
- 11 b. Copy of any contract between Pearson Water Co. and Payson Water Co. or  
12 Brooke Utilities Inc. to haul water from any location to any other location and  
13 particularly from any location to any of the Water Systems owned and  
14 operated by Payson Water Co.
- 15 c. Disclose any and all locations of where any amount of water was acquired and  
16 hauled from whether it was the Town of Payson or any other source to the  
17 East Verde Park Water System or any other location during the Augmentation  
18 Period of May 2011 to October 2011;

19 Respondent's "Response" to this Subpoena was really no response at all. It simply  
20 stated:

21 "All documents related to answering this Subpoena have previously been  
22 provided and are contained within Docket No. W-03514A-12-008."

23 (See Exhibit 1 hereto.)

24 Respondent fails to identify where, when and exactly what documents he is referring to.  
25 Moreover, documents provided in connection with a separate case do not satisfy Respondent's  
26 obligation to reply to the *specific requests* issued in this case. An order compelling compliance  
27 with the August 2, 2012 Subpoena is therefore requested.

28 Respondent was served with a second Subpoena issued on August 17, 2012. That  
Subpoena required Respondent to provide documents responsive to the following requests:

1. Provide Copy of Mr. David Allred's Certification as a Class 4 Water Operator.
2. Provide Copy of the Water Sharing Agreements that Brooke Utilities, Inc. and

1 Payson Water Co. entered into with the following Well Owners to supplement  
2 the MDC System:

- 3 a) Patricia Behm;
- 4 b) El Caballo Club;
- 5 c) Lisa and Ben Harmon;
- 6 d) John Olson;
- 7 e) Mary Hansen;
- 8 f) Any other person or legal entity.

9 3. Provide Copy of records of all payments made to Well Owners of the above  
10 mentioned Water Sharing Agreements and/or any wells from which Brooke  
11 Utilities, Inc. and Payson Water Co. purchase water for the MDC System for  
12 the following Well Owners, Wells and years:

- 13 a) Patricia Behm Well No. 55-560398 for the years 2005 through 2012;
- 14 b) El Caballo Club Well No. 55-585747 for the years 2005 through 2012;
- 15 c) Lisa and Ben Harmon Well No. 55-553798 for the years 1997 through  
16 2012;
- 17 d) John Olson Well No. 55-553798 for the years 2002 through 2012;
- 18 e) Mary Hansen Well No. 55-553798 for the year 2012
- 19 f) Any other person or entity Well No. 55-553798 for the years 1997  
20 through 2012.

21 4. Provide Copy of all records of disconnects or termination of service for the  
22 years 2009, 2010 and 2011 for both non-payment and Curtailment Plan  
23 violations.

24 5. Provide Copy of all documentation, accounts and disbursement of funds  
25 obtained by Brooke Utilities, Inc. and Payson Water Co. from all of the  
26 Curtailment Plan fines and fees imposed on Customers of the MDC System  
27 for the years 2009, 2010, 2011 and 2012.

28 6. Copy of Brooke Utilities, Inc. and Payson Water Co. costs for the cost and  
hauling of water to the MDC System for the year 2010 including Invoices and

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hauling logs.

- 7. Provide a list of all Payson Water Co. employees employed during the year 2011.
- 8. Provide copy of Payson Water Co. CC&N (Certificate of Convenience and Necessity).

Respondent provided no response to the August 17, 2012 Subpoena. Nor has this tribunal granted Respondent's request that the Subpoena be quashed. As such, Respondent remains out of compliance with the order of the Commission and should be directed to promptly provide a complete response.

In addition to attempting to obtain information by Subpoena, Complainant issued Data Requests to Respondent on July 16, 2012. These requests are reproduced below:

**1.0:** According to Payson Water Co. Inc., 2007 to 2010 Annual Reports the Mesa del Caballo System ADEQ PWS 04-030 lists Seven wells in production and Three other wells as sources of water: a) JO 55-588967; b) Behm 55-560398; and c) ECC 04030 i.e. Water Sharing Partner aka Water Sharing Agreement.

**1.0.1:** Please produce copies of the Water Sharing Agreements between Payson Water Co. Inc., or Brooke Utilities, Inc. and: a) Lisa Harmon or John Olson for Well No. 55-553798; and b) El Caballo Club well No. 55-585747 and any records of payment to the well owners for the Behm Well 55-560398, JO 55-588967; Lisa Harmon or John Olson Well No. 55-553798; El Caballo Club 55-585747 for the years 2002 through 2011.

**1.0.2:** Please explain why the following wells are not now nor have they been in production from at least 2007 through 2012 and why nothing has been done by the Company to bring them back into production:

- 1. 55-801698 on (Tract E) 302-34-423 ;
- 2. 55-801699 on (Lot 17) 302-34-33B;
- 3. 55-63112 on (Lot 17) 302-34-33A;
- 4. 55-531101 (Registered to United Utilities) on 8095 E. Barranca Rd.;

**1.0.2.1:** If the Customer is allowed only 97 gallons per day, then over a 30 day period that equals 2,910 gallons. Under what part of the Curtailment Plan do you derive the authority to shut my water off for using 4,000 gallons a month, (30) days that is equal to 133.33 gallons per day?

1           **1.0.2.2:** Produce copy of the check from Brooke Utilities, Inc. or Payson  
2 Water Co. Inc. to reimburse the Customer.

3           **1.0.2.3:** Can the Company's meter determine the difference between  
4 indoor and outdoor water use?

5           **1.0.2.4:** Can it distinguish between actual use and a break in the water  
6 line?

7           **1.0.2.5:** In 2010 the Respondents contracted with Zonge Engineering and  
8 Southwest Ground-Water Consultants, Inc. to conduct a study to determine the  
9 locations of underground water reserves and essentially the best locations in  
10 MDC to drill for water. According to that study and results Two (2) primary  
11 Sites were selected by the Respondents to drill deep wells (approximately 1,200ft.  
12 deep). Deep Well Drilling was presented to the Public as an alternative solution in  
13 the July and August 2011 Public Meetings.

14           The locations of the proposed "Deep Wells" are at or almost identical to  
15 the sites of BUI/PWC Wells No. 55-801698 on (Tract E) 302-34-423 ; 55-801699  
16 on (Lot 17) 302-34-33B; 55-63112 on (Lot 17) 302-34-33A that have been out of  
17 production since 2007 or longer. Please explain why the Company has never  
18 invested the money to deepen these wells or drill new ones or "Hydro-Frack" any  
19 of the wells that have decreased in production to increase production knowing full  
20 well after the study that there existed a high probability of success in drilling to  
21 depths of 400 to 1,000 ft?

22           **1.0.2.6:** If your Driller Brandon Moore said Hydro-Fracking is a "crap  
23 shoot" did he substantiate his opinion with any documentation and did you bother  
24 to consult with another Driller like Chris Miller who does Hydro-Fracking with  
25 excellent positive results and who in fact Hydro-Fracked Well No. 55-631113  
26 prior to Brooke's ownership of the System? If not, why not?

27           **1.0.2.7:** You made representations at the Hearing held on June 26 and 27,  
28 2012 that the studies conducted as referenced above in DR 1.0.2.5 were not  
promising or economically feasible. Was that not a misrepresentation of material  
fact?

**1.0.2.8:** Can you produce an expert opinion to confirm your claims? Is  
your opinion based on your highly inflated cost projections submitted at the  
public meetings that you and the MDCWC sponsored to hedge your Customers  
towards the C. C. Cragin Pipeline project? Please explain in detail?

**1.0.3:** Why do the Respondents in their Annual Reports 2006 to 2010 list  
the well at Lot 164 (8170 Gunsight Ridge) Well No. 553798 Registered to Lisa  
Harmon; as a well owned and operated as a U. S. Geological Survey well on the  
San Pedro River in Cochise County and in your Well Production Reports of 2009  
to 2011 as 55-558967 a well that is Registered to Bill Huddelston and never  
drilled (Lot 26 Vista del Norte) and do not list that well as a WSA well under its  
proper well number designation?

**1.0.4:** In you Annual Reports for 2007, 2008, 2009 and 2010 you list a  
well referred to as "JO 55-588967" in your Report of "Other Water Sources" and  
that you purchased or obtained an average of 5,000,000 gallons per year from this  
well. Please explain how you purchase water from a U. S. Geological Survey  
"Monitor Well" located in Cochise Co. on the San Pedro River and transport it to

1 the MDC System and please provide copy of the Water Sharing Agreement?

2 **1.1:** In a letter from the El Caballo Club, members and Water Committee  
3 not dated but Post Marked May 5, 2010 they claim the Community has a "meager  
4 and dwindling supply of water" and that they "established percentages of usage to  
5 further assist in making sure that each household has adequate water" and that  
6 "the geophysical and hydrological studies don't look too promising." Do you  
7 agree with these statements? If so please explain? If not please explain?

8 **1.1.2:** Can you explain why certain documentation submitted by you and  
9 by Mr. Gehring in Mr. Gehring's and the Jones Complaint at the Hearing on June  
10 26 and 27, 2012 confirm beyond any reasonable doubt that water was hauled to  
11 the East Verde Park System and billed to your Customers in the Mesa del Caballo  
12 System?

13 **1.1.3:** Can you explain why there was an average daily surplus of water  
14 in the amount of 8,731 gallons per day during the entire Augmentation period of  
15 2011 and why hauling water was even necessary?

16 **1.1.4:** How much water was actually hauled to the East Verde Park  
17 System during the Augmentation Period of 2011?

18 **1.1.5:** Provide copy of the Contract or Agreement between Payson Water  
19 Co. Inc. or Brooke Utilities, Inc. and Pearson Water Co. to haul water to  
20 supplement or augment any of the Payson Water Co. Inc. Systems.

21 **1.2:** According to your Well Production Reports for 2009 through 2011  
22 and the corresponding worksheets produced by Mr. Gehring, Mr. Burt and myself  
23 that were submitted as evidence in Docket No. W-03514A-12-0008 at the  
24 Hearing of June 26 and 27, 2012 during the "Augmentation Billing Period" your  
25 wells and the Water Sharing Agreement wells produced 6,106,080 gallons which  
26 your own evidence confirms and according to your documents submitted in  
27 evidence at the Hearing the "Revised Consumption" of the MDC System was  
28 5,345,294 gallons. The difference being that there existed an 824,231 gallon  
Surplus of water throughout the entire 2011 "Augmentation Billing Period."

**1.2.1:** Do you have a massive leak in the Mesa del Caballo System that  
you have neglected or refused to repair?

**1.2.2:** Did you or Mr. Allred instruct Pearson Water Co. and its owner  
and employees to haul water out of the MDC System to other locations?

**1.2.3:** Can you produce any evidence that the hauling of 701,900 gallons  
of water to the MDC System during the 2011 Augmentation Period was even  
necessary? If so, please produce it?

**1.2.4:** Please provide copy of Payson Water Co. Inc. Certificate of  
Conveyance and Necessity?

**1.2.5:** You made representations to the Commission in 2005 that the  
water shortage in the MDC system is comparable to the Pine and Strawberry  
water shortage. Please provide any documentation that the now PSWID has a  
water shortage and still hauls water to supplement the system and that they did  
not have to make extensive repairs and drill new wells where you claimed there  
was no water.

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2 **1.2.6:** Produce and provide all documentation that a water shortage in the  
3 MDC system has increased since 2005 where you were granted an economic  
4 penalty to impose on Customers of the MDC system.

5 **1.3:** In 2010 as part of the Curtailment Tariff you persuaded the  
6 Commission to increase the economic penalty for various Stage Violations.  
7 Please provide any documentation that supports a justification to impose any  
8 economic sanctions on the Customers of the MDC system for failure to comply  
9 with Stages 3 through 5.

10 **1.4:** Please provide documentation and accounting for all Curtailment  
11 Tariff Fines and Reconnection Fees used to offset the purchase and hauling of  
12 water for the years 2009, 2010 and 2011.

13 **1.5:** Please provide documentation that would justify keeping the entire  
14 Community of MdC at a Stage 3 level from May of 2009 until November of 2011  
15 and provide proof that your public notices were given and posted for any other  
16 stage during that period.

17 **1.6:** Referencing the PWC 2009 MDC system Annual Report. That report  
18 shows that PWC sold 17,346,000 gallons. The total water purchase and the  
19 pumped water show 16,570,800 gallons. Provide the documentation and the  
20 accounting method used to sell more water (775,200 gallons) than you pumped  
21 and purchased from Water Sharing Agreement Wells or any other source.

22 **1.6.1:** Please provide the accounting method used to show the difference  
23 between purchased water and hauled water.

24 **1.7:** Referencing the PWC 2010 MDC system Annual Report. That report  
25 shows that PWC sold 14,714,000 gallons. The total water purchased and pumped  
26 show 15,172,000. Please provide the documentation and the accounting method  
27 used to purchase and produce more water (458,000 gallons) than you sold;  
28 explain the surplus via worksheet; and why BUI/PWC had to haul water to the  
MDC System during 2010.

**1.7.1:** On page 8 under Comparative Statement of Income and Expense  
Item "Acct. No. 610" Purchased Water shows a total water purchase of  
\$24,322.00. Provide a worksheet of the "Hardcastle Method" to haul water when  
well production exceeded gallons sold.

**1.7.2:** On page 8 under Comparative Statement of Income and Expense  
Item "Acct. No. 675" Miscellaneous Expense" please provide an explanation of  
that expense and please explain what is meant by Non-System Expenses and what  
those expenses are for?

**1.8:** Provide a detailed management guideline by BUI/PWC that is used to  
monitor water levels of the MDC System for the sole purpose of moving from  
Stage 1 thru any other Stage and back again.

**1.8.1:** Provide a detailed management guideline by BUI/PWC that is used  
in conjunction to haul water in the event that the system goes into Stage 3 thru 5.

**1.8.2:** Provide a detailed management guideline by BUI/PWC that is used  
to stop the hauling of water.

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**1.8.3:** Provide a copy of all phone calls, emails, records or contact with Pearson Water Co. by any of BUI or PWC agents or employees particularly Mr. David Allred for the dispatch of water tankers to haul water to the various systems needing Augmentation for the Augmentation Period between May and October 2011.

**1.9:** Provide all records or documents of any verbal agreements or written contracts between BUI or PWC and Pearson Water Co. for the specific purpose of hauling water for Payson Water Co. Inc. Water Systems.

**1.10:** Please explain why, your Annual Reports for 2010 and 2011 show no water purchases for the EVP System or other Systems and only to the MDC System when in fact water was hauled to the EVP System in both of those years.

**1.10.1:** Please produce a copy of the "Water Use Data Sheet by Month for Calendar year 2011" for the Mesa del Caballo System and explain why it was left out of PWC's Annual Report?

**1.11:** All of the Water Storage Facilities were originally set up by UMAS/United Utilities so that the Fire Department could access them in times of a Fire Emergency. Once BUI obtained the MDC System you denied the Fire Department access to those water resources for Fire Emergencies. Please explain and justify why you have denied them access after obtaining the System?

**1.11.1:** As part of your plan to either Drill Deep Wells or connect to the C. C. Craigen Pipeline you have budgeted or included in your estimates of cost \$221,000.00 for a 200,000 gallon Storage Facility. Is it that facility necessary and is it your intention to deny the Fire Department access to those additional resources for fire suppression purposes as well?

**1.11.2:** Is the estimated cost of the Storage Facility the actual cost or does it include a built in profit margin?

**1.12:** Upon PWC's application to the ACC for approval of a Water Augmentation Surcharge Tariff you submitted various Invoices from Pearson Water Co. for the hauling of water from distant locations including Indian Creek, Tonto, Starlight, Gisela to Mesa del Caballo and East Verde Park.

**1.12.1:** Please produce documentation confirming the exact locations and name of the Systems where water was obtained from Indian Creek, Tonto, Starlight and Gisela and explain why you hauled water from such distant locations instead of from your Star Valley System or the Town of Payson.

**1.12.2:** Please provide record of total costs to haul water just to the MDC System for the years 2009 through 2011?

**1.12.3:** Pearson Water Co. charges \$150.00 per hour to haul while other Transport Companies charge \$80.00 to \$85.00 per hour. Has the Company tried to contact other Transport Companies to get better rates? If not, why not?

**1.12.4:** Please provide copies of Invoices No. 8805, 8806, 8809, 8810, 8813, 8814, 8817, 8818, 8820, 8821, 8824, 8825 and their corresponding "BUI Hauling Logs"?

1           **1.13:** Provide a full and complete Copy of your Emergency Procedures  
2 Manual.

3           **1.14:** Provide copy of the notice presented to the Company by the ACC to  
4 turn the Complainant's water back on and provide an explanation as to why you  
5 or the Company refused to turn it back on.

6           **1.14.1:** Provide proof of the Stage when the meter was read including the  
7 time and date.

8           **1.14.2:** At what time on June 6, 2011 was water hauling initiated during  
9 Stage 3?

10           **1.14.3:** Identify the time, date and employee, who turned the water off.

11           **1.14.4:** Produce any documentation that any attempt was made by the  
12 Company to notify the Customer in person or by telephone that the Service was to  
13 be terminated.

14           **1.14.5:** Where is the Customer Service Center located for Payson Water  
15 Co. Inc. or Brooke Utilities, Inc. and who is the Director or Superintendent of the  
16 Customer Service Center?

17           **1.14.6:** Identify "High Water Use" for Customers of the MDC System  
18 and does the Company have a policy to notify Customers of High Water Use by  
19 Mail or any other means.

20           **1.14.7:** Since BUI and Payson Water Co. Inc. acquired the MDC System  
21 from United Utilities how often has the hauling of water been necessary and for  
22 what reasons and how much money has been spent to haul water since 2009.

23           **1.14.8:** Produce documentation evidencing the cost of water hauling for  
24 the years 2005 through 2011.

25           **1.14.9:** What are the current "Static Levels" of the Company and WSA  
26 Wells in the MDC System and how do they differ from the 2009 levels?

27           **1.14.10:** At the Hearing held on June 26 and 27, 2012 in Docket No.  
28 03514A-12-0008 Mr. Allred claimed the MDC System is "dilapidated" and that  
"aging wells" are not capable of keeping up with Customer Consumption.

**1.14.10.1:** If the System is "dilapidated" why has the Company not made  
improvements or conducted necessary maintenance to upgrade or repair the  
System to make it more efficient and productive?

**1.14.10.2:** If the System is "dilapidated" and "aging wells" are not as  
productive as they have been in the past then why hasn't the Company cleaned  
the wells out by "Hydro-Fracking" and acquired a second opinion on the issue of  
"Hydro-Fracking" from someone who does "Hydro-Fracking" like Chris Miller  
of Aero Drilling in Payson?

**1.15:** Who is responsible for the collection of fines and their disperse or  
application to offset Water Augmentation costs, who is responsible for the  
refunds of fines and provide identification of the "interest bearing trust account"  
set up by the Company to collect and disperse the funds. Provide proof that such

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funds were dispersed to off set Augmentation Costs.

**1.15.1:** Do the costs to haul water between 2009 and 2011 exceed the actual and un-inflated cost to drill a well 400 to 900 feet?

**1.16:** Provide documentation that the Aquifer under Mesa del Caballo is inadequate to maintain water for the Customers of Payson Water Co. Inc. MDC System.

Respondent provided no information in response to these multiple requests. His only "Response" is attached hereto as Exhibit 2. The document provides no useful information whatsoever. Complainant filed a Motion to Compel Respondent to Comply with Complainant's 1<sup>st</sup> Set of Data Requests on August 1, 2012. However, there has been no ruling on this Motion. Respondent respectfully requests an order compelling Respondent to comply with his obligation to provide Complainant with information needed to fully prepare for and present his case. It is telling that, despite the number of requests set forth above, Respondent has provided **not a single document in response**. By failing to do so, Respondent has refused to honor subpoenas issued by the Commission and the rules of procedure relating to the pre-hearing discovery process. Based upon the foregoing, Complaint requests that this Motion to Compel be granted.

DATED: March 15, 2013.

WALKER & HARPER, PC



Michael J. Harper  
Attorney for J. Alan Smith

1 ORIGINAL and 13 copies mailed for filing  
2 this 15<sup>th</sup> day of March, 2013 to:

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 W. Washington St.  
6 Phoenix, AZ 85007

7 and copies mailed on the same date to:

8 Dwight Nodes, Administrative Law Judge  
9 HEARING DIVISION  
10 Arizona Corporation Commission  
11 1200 W. Washington St.  
12 Phoenix, AZ 85007

13 Robert T. Hardcastle  
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15 P.O. Box 82218  
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27 Robin Mitchell, Esq.  
28 ARIZONA CORPORATION COMMISSION  
1200 W. Washington Street  
Phoenix, AZ 85007

  
\_\_\_\_\_

**EXHIBIT 1**

**PAYSON WATER CO., INC.'S RESPONSES TO**  
**SMITH SUBPOENA DATED AUGUST 2, 2012**  
**ARIZONA CORPORATION COMMISSION**  
**DOCKET NO. W-03514A-12-0007**  
**SMITH vs. PAYSON WATER CO., INC.**



At the August 7, 2012 Hearing the Administrative Law Judge stated for the record that he was taking Administrative Notice of all documents in the record under Docket No. W-03514A-12-0008. Accordingly, Payson Water Co. answers the questions related to the Subpoena referenced above as follows:

Question 1 (a, b, c): All documents related to answering this Subpoena have previously been provided and are contained within Docket No. W-03514A-12-008.

**EXHIBIT 2**

**Payson Water Co.'s Responses to Smith's**  
**FIRST Set of Data Requests**

Smith vs. Payson Water Co.  
Docket No. W-03514A-12-0007

- 1.0 No question asked.
- 2.0 Objection relevance. Water Sharing Agreements are not relevant to the Complaint filed.
- 3.0 Previously asked and answered.
- 4.0 Pursuant to Decision No. 71902, Curtailment Tariff.
- 5.0 Question is unclear as customer is not identified.
- 6.0 No.
- 7.0 Question is unclear as proximity of the break is not identified.
- 8.0 Objection relevance. Hydrofracking is not relevant to the Complaint.
- 9.0 No. We consulted with more knowledgeable professionals.
- 10.0 No.
- 11.0 Objection. Expert opinions of this matter are not relevant.
- 12.0 Previously asked and answered.
- 13.0 Previously asked and answered.
- 14.0 Payson Water Co.'s agreement with statements made by third parties is not relevant.
- 15.0 Objection, speculation and calls for a conclusion.
- 16.0 Previously asked and answered.
- 17.0 Objection relevance. Water systems other than Mesa del Caballo are not included in this Complaint.
- 18.0 Not applicable.
- 19.0 No question asked.
- 20.0 Objection, speculation.
- 21.0 Previously asked and answered.
- 22.0 Objection, calls for conclusion and relevance.
- 23.0 Objection, exceeds the scope of this Complaint.
- 24.0 Objection, exceeds the scope of this Complaint.
- 25.0 Objection, exceeds the scope of this Complaint.
- 26.0 Previously asked and answered.
- 27.0 Previously asked and answered.
- 28.0 Previously asked and answered.
- 29.0 Question is unclear. Respondent not able to answer.
- 30.0 Objection, exceeds the scope of this Complaint.

- 31.0 Question is unclear as to the nature of the method requested.
- 32.0 Objection, exceeds the scope of the Complaint.
- 33.0 Objection, exceeds the scope of this Complaint.
- 34.0 Objection, exceeds the scope of this Complaint.
- 35.0 Objection, exceeds the scope of this Complaint.
- 36.0 Objection, exceeds the scope of this Complaint.
- 37.0 Objection, exceeds the scope of this Complaint.
- 38.0 Previously asked and answered.
- 39.0 Previously asked and answered.
- 40.0 Objection, exceeds the scope of this Complaint.
- 41.0 Objection, exceeds the scope of this Complaint.
- 42.0 Objection, exceeds the scope of this Complaint.
- 43.0 No question asked.
- 44.0 Objection, exceeds the scope of this Complaint.
- 45.0 Previously asked and answered.
- 46.0 Previously asked and answered.
- 47.0 Previously asked and answered.
- 48.0 Publicly available.
- 49.0 Objection, exceeds the scope of this Complaint.
- 50.0 Documentation to be presented at trial.
- 51.0 Objection, exceeds the scope of this Complaint.
- 52.0 Documentation to be presented at trial.
- 53.0 Pursuant to regulation.
- 54.0 Objection, exceeds the scope of this Complaint.
- 55.0 Objection, exceeds the scope of this Complaint.
- 56.0 Objection, exceeds the scope of this Complaint.
- 57.0 Objection, exceeds the scope of this Complaint.
- 58.0 Objection, exceeds the scope of this Complaint.
- 59.0 No question asked.
- 60.0 Objection, exceeds the scope of this Complaint.
- 61.0 Objection, exceeds the scope of this Complaint.
- 62.0 Objection, exceeds the scope of this Complaint.
- 63.0 Objection, exceeds the scope of this Complaint.
- 64.0 Objection, exceeds the scope of this Complaint.