

Sharla Dillon - RE: Docket No. 10-00189 Responses to Discovery

From: Richard Collier
To: Dillon, Sharla; Grimes, Dale
Date: 11/24/2010 5:49 PM
Subject: RE: Docket No. 10-00189 Responses to Discovery
CC: ChatterjeeBrown, Shilina; Clayton, Steele; dchigney@GKHPC.com; dscholes@branstetterlaw.com; Grams, Kelly; Greenholtz, Tom; Hitchcock, Frederick; hwalker@babco.com; Katharine.Mapes@spiegelmc.com; Killion, David; L.North, Harold; MarkBrooks@UWUA.net; Mary.White@ag.tn.gov; mcmahan@chattanooga.gov; Ryan.McGehee@ag.tn.gov; Scott.Strauss@spiegelmc.com; Smith-Ashford, Monica; Vance.Broemel@ag.tn.gov

To the Parties:

In light of the Holiday weekend, the timing of my earlier e mail and the pending rulings on outstanding motions to compel, it is not unreasonable for the supplemental responses by TAWC be provided in line with the date for responses to the additional discovery instead of November 29. Should there be any issues with respect to those supplemental responses, such can be raised during the meeting of the parties on Thursday, December 2, 2010.

Enjoy the holiday and have a Happy Thanksgiving.

Richard Collier

>>> "Grimes, Dale" <DGrimes@bassberry.com> 11/24/2010 5:31 PM >>>
Richard:

We have not had the opportunity to compare our notes with yours as to what matters were resolved or remain unresolved from the Monday status conference. However, there was one matter that was not actually discussed in our meeting with you and the other counsel after the status conference: when the Company would produce those items it voluntarily agreed to supplement at the hearing. A reasonable interpretation of the discussions would be that those supplemental responses would be due to be filed by 10 am on Thursday, December 2, along with the formal filing of all the other supplemental responses. Given that we are now in the midst of the Thanksgiving holiday weekend, and the people needed to prepare the supplemental responses to the resolved requests are out of pocket for several days, the Company will need that time to prepare those responses.

We hope everyone has a happy Thanksgiving.

Dale Grimes

R. Dale Grimes

150 Third Avenue South, Suite 2800
Nashville, TN 37201
615-742-6244 • 615-742-2744 F
dgrimes@bassberry.com • www.bassberry.com

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