

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:	)	
	)	
PETITION OF ISHA FOUNDATION, INC.	)	DOCKET NO. 26-00034
FOR DECLARATORY JUDGMENT	)	
	)	
	)	

**ISHA FOUNDATION, INC.'S DISCOVERY REQUESTS TO
CONSUMER ADVOCATE**

ISHA Foundation, Inc., (“ISHA”) hereby submits these Discovery Requests to the Consumer Advocate Division of the Tennessee Attorney General’s Office (“Consumer Advocate” or “you”) pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11.

DEFINITIONS

1. “And/or.” The words “and” or “or” shall be construed conjunctively or disjunctively, as is necessary to make each Request inclusive rather than exclusive; and the singular should be read to include the plural and the plural shall include the singular, as is necessary to make each Request inclusive rather than exclusive.

2. “Communication” means and includes, without limitation, any meeting, discussion, contact, conference, telephone conversation, letter, telegram, fax, e-mail, electronic instant message, chat room, slack messages, WhatsApp message, electronic text message, Internet posting, billing statement, electronic recording, or other form of written or oral information transmission or exchange.

3. “Describe” of the phrase “describe in detail” requires you to: (a) describe in detail sufficient to communicate the information given, all of the facts, inferences, and conclusions

known to or believed by you concerning the subject matter of the Interrogatory; (b) identify the documents relevant to the subject matter of the Interrogatory; (c) identify the time, place, medium, and parties to any communication; and (d) identify persons with knowledge of the matters set forth in your answer to the Interrogatory.

4. The term “Document(s)” is used in its broadest possible sense and shall mean all writings of any kind, electronic or hard copy, including the originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and whether printed, recorded, created, or reproduced by any mechanical means or process, or written or produced by hand, and shall include email, text messages, any form of social media (Facebook, LinkedIn, etc.), any form of web conference or group chat (Zoom, Teams, etc.) and summaries of Communications or any other form of Communication identified above.

5. “Identify,” with respect to natural persons, means to provide the name, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to other persons besides natural persons, this term means to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity.

6. “Identify,” with respect to documents, means to give (to the extent known): (i) the date; (ii) the author; (iii) the recipient; (iv) the type of document (*e.g.*, letter, memorandum, telegram, chart, etc.); (v) the number of pages; (vi) its present location; *and* (vii) its present custodian.

7. “Including” is intended to be comprehensive and means “including, but not limited to;” the word “any” should mean “any and all;” and the word “each” should mean “each and every.”

8. “Related” or “referring to” means evidencing, supporting, contradicting, constituting, containing, recording, discussing, summarizing, analyzing, disclosing, mentioning in whole or in part, or otherwise pertaining to in any way.

9. “Concerning,” “relating,” or “reflecting” include but are not limited to: relating to, mentioning, respecting, referring to, responding to, pertaining to, connected with, comprising, commenting on, corroborating, discussing, showing, describing, evidencing, analyzing, and constituting.

10. The term “person” includes natural persons, corporations, partnerships, associations, ventures, and all other forms of organization or association.

INSTRUCTIONS

1. In responding to the following Interrogatories and Requests, you are requested to set forth all of the information known to you or available to you, including, but not limited to, all relevant and non-privileged information contained in your records or writings or documents in your possession or under your control, and all relevant and non-privileged information known to or in the possession of your attorneys.

2. In the event you contend that you are unable to answer or respond in full to any of the following Requests after exercising due diligence to secure information to do so, then state your response or answer to the extent possible, specifying your inability to answer or respond to the remainder, stating whatever information or knowledge you have concerning the unanswered portion, and detailing what you did in attempting to secure the unknown information.

3. In answering each of the Interrogatories set forth herein, please identify each and every document, if any, that was used in any way to formulate each particular answer.

4. Each Interrogatory shall be answered separately and fully in writing and under oath, unless it is objected to, in which event the objecting party shall state the reasons for objection. If your objection pertains only to part of an Interrogatory or Request, then you shall further specify the part to which you have an objection and then answer any unobjectionable part(s).

5. If you object to any of the following Requests, then you shall state the reasons for the objection(s). If your objection pertains only to part of a Request, then you shall further specify the part to which you have an objection and then answer any unobjectionable part(s).

6. In responding to the Requests set forth below, furnish such documents and things as are available to you, not merely such documents and things as are in your possession or control. This means you are to furnish documents and things which are available to or in the possession or control of your employees, representatives, experts, witnesses, servants, or agents, including your attorney (unless privileged) or any agent or investigator for you or your attorney (unless privileged).

7. Produce all emails (with attachments) in .pst load files with metadata preserved.

8. In the event that any answer, response, or document or thing called for by these Requests is withheld on the basis of privilege, immunity, or any other similar claim, please furnish a list identifying each answer, response, or document or thing so withheld, together with the following information:

- (a) The reason for withholding;
- (b) The nature of the privilege or immunity being asserted
(including work product);

- (c) A statement of facts setting forth the basis for any claim of privilege, work product, immunity, or other ground of nondisclosure; *and*
- (d) Identify each person having knowledge of the factual basis on which the claim of privilege, immunity, work product, or other ground for nondisclosure is based.

9. If any information or documents or things requested by these Requests was at one time in existence but is no longer in existence (*e.g.*, has been destroyed, lost, or discarded), or has been made unavailable, then identify the nature of the information and state:

- (a) The date upon which it ceased to exist;
- (b) The circumstances under which it ceased to exist;
- (c) The identity of all persons having knowledge of the circumstances under which it ceased to exist; *and*
- (d) The identity of all persons having knowledge or who had knowledge of the contents thereof.

10. If you believe that any of these Requests, Definitions, or Instructions are ambiguous, identify the language you consider ambiguous and state the interpretation you are employing in your answer.

12. Any verb used in any tense shall be read to mean that verb in all its tenses.

13. The singular shall include the plural and vice versa.

14. The masculine shall include the feminine and vice versa.

15. These Requests are deemed to be continuing in nature to the extent required by the Tennessee Rules of Civil Procedure. If, after answering and responding to these Requests, you

obtain or become aware of any further information responsive to these Requests, you are required to supplement your answers or responses to these Requests and provide such additional information to Phase2.

INTERROGATORIES

1. State the full name, present occupation, present employer, residence and business addresses of the person(s) answering these Discovery Requests, the person(s) who assisted in the preparation of the answers to these Discovery Requests, the person(s) who provided any information or documents or things reviewed in connection with the preparation of the answers to these Discovery Requests, and the person(s) who provided documents or things or is otherwise in possession of documents or things that are responsive to the Requests for Production below.

ANSWER:

2. Identify all documents referred to or relied upon by you in preparation of your answers to the Discovery Requests.

ANSWER:

3. Identify all documents you intend to introduce as exhibits at the hearing in this matter.

ANSWER:

4. Describe in detail all communications and correspondence that you, including lawyers, staff and consultants, have had with the Tennessee Department of Environment and Conservation ("TDEC"), its agents, lawyers and/or its employees concerning ISHA since April 21, 2026 including any and all communications and correspondence sent or responded to on your

behalf; include the dates of the communications and correspondence; and identify the subject matter and details of the communications and correspondence.

ANSWER:

5. Describe in detail all communications and correspondence that you, including lawyers, staff and consultants, have had with the Warren County Utility District, its agents, attorneys and/or its employees concerning ISHA since April 21, 2026 including any and all communications and correspondence sent or responded to on your behalf; include the dates of the communications and correspondence; and identify the subject matter and details of the communications and correspondence.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents you reviewed or relied upon in preparing your responses to the Interrogatories.
2. Produce all communications or documents that evidence communications (emails, summaries of meetings or phone calls, etc.) between you and TDEC, including but not limited to communications with lawyers, staff or consultants since April 21, 2026.
3. Produce all communications or documents that evidence communications (emails, summaries of meetings or phone calls, etc.) between you and the Warren County Utility District including but not limited to communications with lawyers, staff or consultants since April 21, 2026.

REQUEST FOR ADMISSIONS

1. Admit or deny that the proposed ISHA Golf project is located within the service territory of the Warren County Utility District.

ANSWER

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP



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Attorney for ISHA Foundation

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2026, a copy of the foregoing was served via electronic mail and U.S. Mail to the following:

Shilina Brown

Ryan McGehee

Assistant Attorney General

Office of the Tennessee Attorney General Consumer Advocate Division

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Henry Walker