

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth)
Telecommunications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

Docket No. 050257

**MIAMI-DADE COUNTY'S OBJECTIONS TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR PRODUCTION**

Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its Objections to BellSouth Telecommunications Inc.'s ("BellSouth") First Request for Production (the "Request"), pursuant to Fla. R. Civ. P. 1.350 and states:

1. The County objects to any right BellSouth claims that "the County provide specific bate numbers of previously produced documents that the County claims are responsive to the Request." Said request is overbroad, burdensome, and the information does not exist absent a manual search of previously produced responsive documents, which would require extensive time and resources the County lacks. The County has produced over 80,000 pages of responsive documents, to three (3) BellSouth propounded requests for production, in discovery that has spanned approximately three and one-half (3½) years, in the matter *BellSouth Telecommunications, Inc. v. Miami-Dade County, Fla.*, Case No. 02-28688 CA 03 (Fla. 11th Cir. Ct. filed Nov. 12, 2002). It is not the County's burden to provide BellSouth with specific bates stamp numbers, but only when said responsive documents were produced previously.

*In re: Complaint of BellSouth Telecommunications, Inc.
Docket No. 050257-TL
County Objections to First Request for Production*

2. The County objects to any definition, instruction, or request contained in the Request, to the extent such definition, instruction and/or request seeks to impose a burden on the County beyond that required by the Florida Rules of Civil Procedure, and/or seeks to alter the meaning of the terms used in the Request.

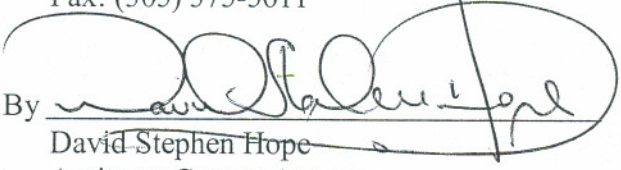
3. The County objects to the Request to the extent the Request seeks discovery of information protected by any privilege or protection, including without limitation, attorney-client privilege or work product doctrine. The County waives no privilege or protection by the inadvertent production or information or documents thereto.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG
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By


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *13th*
day of June 2006, to:

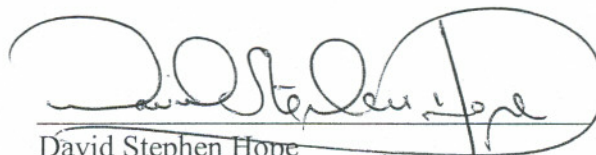
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