

9/21 11:00 am

NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 614-2086

ORIGINAL
FILE COPY

September 19, 1994

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Supplemental Response to CWA's Motion to Strike Prehearing Statement and Motion to Compel Production. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (22)

RECEIVED & FILED
nan
FPSC-BUREAU OF RECORDS
Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
R. D. Lackey

ACK ✓
AFA Jake
ADD _____
CIT _____
COT Morton
CTR _____
EAG _____
LEG Stach
LIM 6
OPC _____
RCH Kinson
SEC 1
WAS _____
QTH _____

DOCUMENT NUMBER-DATE
09587 SEP 19 94
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)

Docket No. 920260-TL

Filed: September 19, 1994

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
SUPPLEMENTAL RESPONSE TO CWA'S MOTION TO STRIKE
PREHEARING STATEMENT AND MOTION TO COMPEL PRODUCTION

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") pursuant to Rule 25-22.037(2), Florida Administrative Code, and hereby files a supplemental response to the Motion to Strike Southern Bell's Prehearing Statement and Motion to Compel Production filed by Locals 3121, 3122, and 3107 Communication Workers of America, AFL-CIO (the "CWA"). In support hereof, Southern Bell shows the Florida Public Service Commission (the "Commission") the following:

1. On September 14, 1994, Southern Bell served its Response to the CWA's Motion to Strike Prehearing Statement and Motion to Compel Production. Due to the fact that undersigned counsel was absent from the office on that day, an affidavit was not attached to Southern Bell's response. Attached hereto are the affidavits which were executed upon the undersigned's return to Atlanta from Tallahassee. These affidavits supplement Southern Bell's original response.

DOCUMENT NUMBER-DATE

09587 SEP 19 94

FPSC-RECORDS/REPORTING

Respectfully submitted this 19th day of September, 1994.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Robert G. Beatty
ROBERT G. BEATTY (28)

c/o Marshall M. Criser
400 - 150 South Monroe Street
Tallahassee Florida 32301
(305) 530-5555

Harris R. Anthony
HARRIS R. ANTHONY (28)

NANCY B. WHITE
4300-675 West Peachtree Street
Atlanta, Georgia 30375
(404) 529-5387

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 19th day of September, 1994 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
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Vicki Gordon Kaufman
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Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
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atty for FPTA

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Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
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Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
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Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Stan Greer
Division of Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Nancy B. White
(28)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern) Docket No. 920260-TL
Bell Telephone and Telegraph)
Company)
_____)

AFFIDAVIT OF NANCY B. WHITE

BEFORE ME, the undersigned notary public duly authorized to administer oaths, personally appeared Nancy B. White, who, being duly sworn, deposes and says:

1.

My name is Nancy B. White. I am over the age of twenty-one years and am otherwise competent to make this sworn statement. I give this affidavit based upon my personal knowledge for use in the captioned case. My business address is 4300 Southern Bell Center, 675 West Peachtree Street, Atlanta, Georgia 30375.

2.

I am an attorney with BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company and as an attorney for Southern Bell, I have been assigned responsibility for the conduct of the above-captioned litigation before the Florida Public Service Commission (the "Commission").

3.

On August 29, 1994, Southern Bell's Tallahassee office received in the mail a pleading denominated Response in Opposition to Southern Bell Telephone and Telegraph Company's Motion for Protective Order, Motion to Strike Portions of CWA's Prehearing Statement and CWA's Motion to Strike Prehearing Statements and Motion to Compel Production (the "Motion"). The

Motion was received by Southern Bell on August 29, in Tallahassee, but, despite the certificate of service, was never received in Atlanta. Accordingly, I, as the responsible attorney for this matter, was not made aware of the existence of the Motion until September 13, 1994.

4.

Because I was representing Southern Bell in hearings before the Commission from September 12 to September 15, I was unable to personally respond to the Motion. I therefore asked Harris R. Anthony, another Southern Bell attorney, to prepare a response to the Motion. To the best of my knowledge, information and belief, Mr. Anthony was not aware of the Motion until I informed him about it late on the afternoon of September 13.

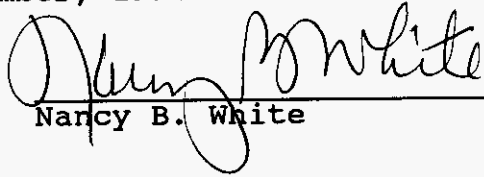
5.

At my request, Mr. Anthony on September 14, 1994, prepared a response to the Motion, which was filed with the Commission on September 14, 1994. A copy of that response is attached hereto as Attachment "A". Mr. Anthony was unable to attach my affidavit to the Response because I did not return to my Atlanta office from Tallahassee until September 16, 1994. Upon my return, I prepared this affidavit.

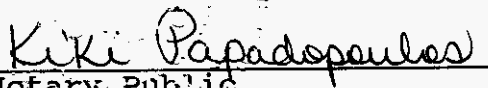
6.

Further, affiant sayeth not.

Dated this 19th day of September, 1994.


Nancy B. White

Sworn to and subscribed
before me this 19th day
of September, 1994.


Notary Public

Notary Public, DeKalb County, Ga.
My Commission Expires Feb. 24, 1996

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern) Docket No. 920260-TL
Bell Telephone and Telegraph)
Company)
_____)

AFFIDAVIT OF HARRIS R. ANTHONY

BEFORE ME, the undersigned notary public duly authorized to administer oaths, personally appeared Harris R. Anthony, who, being duly sworn, deposes and says:

1.

My name is Harris R. Anthony. I am over the age of twenty-one years and am otherwise competent to make this sworn statement. I give this affidavit based upon my personal knowledge for use in the captioned case. My business address is 4300 Southern Bell Center, 675 West Peachtree Street, Atlanta, Georgia 30375.

2.

I am an attorney with BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company and, as an attorney for Southern Bell, I have had, to date, with Nancy B. White, responsibility for the conduct of the above-captioned litigation before the Florida Public Service Commission (the "Commission").

3.

On August 29, 1994, Southern Bell's Tallahassee office received in the mail a pleading denominated Response in Opposition to Southern Bell Telephone and Telegraph Company's Motion for Protective Order, Motion to Strike Portions of CWA's

Prehearing Statement and CWA's Motion to Strike Prehearing Statements and Motion to Compel Production (the "Motion"). The Motion was received by Southern Bell on August 29, in Tallahassee, but, despite the certificate of service, was never received in Atlanta. I, as an attorney for this matter, was not made aware of the existence of the Motion until September 13, 1994, when Ms. White asked her secretary to provide me with a copy of the Motion. I received that Motion after 5:00 p.m. on September 13.

4.

Because Ms. White was representing Southern Bell in hearings before the Commission from September 12 to September 15, she asked me to prepare a response to the Motion.

5.

On September 14, 1994, I prepared a response to the Motion, which was filed with the Commission on September 14, 1994. A copy of that response is attached hereto as Attachment "A".

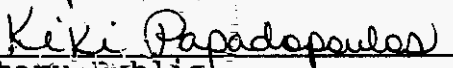
6.

Further, affiant sayeth not.

Dated this 19th day of September, 1994.


Harris R. Anthony

Sworn to and subscribed
before me this 19th day
of September, 1994.


Notary Public
Notary Public, DeKalb County, Ga.
My Commission Expires Feb. 24, 1996

Attachment "A"

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| | | |
|--------------------------------|---|---------------------------|
| In re: Comprehensive review of |) | |
| revenue requirements and rate |) | |
| stabilization plan of Southern |) | Docket No. 920260-TL |
| Bell Telephone and Telegraph |) | |
| Company |) | Filed: September 14, 1994 |

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
 RESPONSE TO CWA'S MOTION TO STRIKE PREHEARING
 STATEMENT AND MOTION TO COMPEL PRODUCTION

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell"), pursuant to Rule 25-22.037(2), Florida Administrative Code, and hereby responds to the Motion to Strike Southern Bell's Prehearing Statement and Motion to Compel Production filed by Locals 3121, 3122, and 3107 Communications Workers of America, AFL-CIO (the "CWA"). In support hereof, Southern Bell shows the Florida Public Service Commission (the "Commission") the following:

1. On August 26, 1994, the CWA served its Response in Opposition to Southern Bell Telephone and Telegraph Company's Motion for Protective Order, Motion to Strike Portions of CWA's Prehearing Statement and CWA's Motion to Strike Prehearing Statements and Motion to Compel Production (the "CWA Motion"). Although Southern Bell's Tallahassee office received a copy of CWA's Motion on August 29, 1994, Southern Bell's Counsel responsible for this proceeding was not made aware of the CWA's Motion until the evening of September 13, 1994. Southern Bell's failure to notify its responsible Counsel was an administrative oversight and constitutes excusable neglect for Southern Bell's filing its response to CWA's Motion on even date herewith rather than on September 12, 1994. Winn Dixie Stores, Inc. v.

Danielson, 544 So.2d 320 (4th D.C.A., 1989); and Carter, Hawley, Nale Stores, Inc. v. Whitman, 516 So.2d 83 (3rd D.C.A., 1987). Moreover, CWA will suffer no prejudice by allowing Southern Bell to file its pleading at this time since the Prehearing Officer has continued the hearings in this matter and has not yet ruled on any discovery matters. Finally, as shown below, Southern Bell has meritorious defenses to the CWA's Motion as the CWA's arguments are totally without merit and should be disregarded on their face.

2. With respect to CWA's Motion to Strike Southern Bell's Prehearing Statement, even a cursory review of the facts reveals that Motion to be fallacious and without any merit whatsoever. In Order No. PSC-94-0893-PCO-TL, Order Establishing Procedure, in this docket, the Commission stated:

Pursuant to Rule 25-22.038(3), Florida Administrative Code, a prehearing statement shall be required of all parties in this docket. Staff will also file a prehearing statement. The original and fifteen copies of each prehearing statement shall be prefiled with the Director of the Division of Records and Reporting by the close of business, which is 4:45 p.m., on the date due. A copy of the prehearing statement shall be served on all other parties and staff no later than the date it is filed with the Commission.

Id. at 3. This same order, at page 6, then sets the date for filing and service of prehearing statements as August 15, 1994.

3. Southern Bell has fully complied with these requirements. It filed its Prehearing Statement with the Director of the Division of Records and Reporting on August 15,

1994. (See Attachment "A", which is a copy of the cover letter, stamped as received by the Commission on August 15, 1994). On the same date, Southern Bell served all parties, including the CWA, with a copy of the same Prehearing Statement. Accordingly, Southern Bell has fully complied with the Commission's Order Establishing Procedure. The fact that the CWA may not have received Southern Bell's Prehearing Statement until August 18, 1994, is of no legal consequence whatsoever. For these reasons, CWA's Motion to Strike Southern Bell's Prehearing Statement is baseless and should be rejected out of hand.¹

4. In the CWA's Motion, it also argues that the Commission should compel Southern Bell to respond to certain discovery propounded by CWA. Again, CWA's Motion should be denied. In its Order Establishing Procedure, the Commission set forth the three issues to be litigated and resolved in this matter. Those issues are:

- ISSUE 1: Under the terms of the Settlement, is the Florida Public Service Commission required to hold hearing (sic) on the rate design issues to implement the proposed rate reductions? (a, f, g).
- ISSUE 2: Under applicable law, does the Commission have the authority to adopt the CWA proposal? (b, c, e).

¹ The CWA apparently continues to operate under the misconception that Southern Bell's Renewal of its Motion to Dismiss, filed August 10, 1994, was predicated on CWA's failure to file timely its prefiled testimony. This was not the case. Southern Bell did not raise the argument of timeliness vel non as one of the bases for that Motion. Id. at 3.

ISSUE 3: Whether the rate reductions described in Order PSC-94-0669-FOF-TL are in the best interest of the payor (sic)? (d).

5. Thus, these proceedings are limited to issues surrounding the disposition of \$10 million scheduled for July 1, 1994 pursuant to the terms of Commission Order No. 94-0172-FOF-TL, which approved the Settlement in this docket. That Order is now a final order since it has never been subject to any protest or appeal. Any discovery in the case at bar must therefore relate to the disposition of the \$10 million and not the underlying settlement.²

6. The CWA first seeks authority to depose Mr. Joseph P. Lacher, Southern Bell's State President - Florida. As more fully described in Southern Bell's Motion for Protective Order, filed August 17, 1994 (a copy of which is attached hereto for the Commission's reference as Attachment "B"), Mr. Lacher's knowledge relates to issues surrounding the underlying Settlement, not rate design issues. Given Mr. Lacher's position, his lack of knowledge relating to the issues now being litigated, and the fact that others who do have knowledge related to the relevant issues are available to be deposed, CWA's Motion to Compel Mr. Lacher's deposition should be denied for what it is: simple harassment.

² The only exception to this is the issue of whether or not the Settlement requires a hearing on rate design issues. This is a legal question for which discovery is both unnecessary and inappropriate.

7. CWA's arguments with regard to Harris R. Anthony's testimony should likewise be rejected. At page 3 of CWA's Motion it states, "Certainly, Southern Bell is not attempting to preclude the public or CWA from access to settlement discussions and negotiations related to this docket that took place with third parties." Any such discussions or negotiations are totally irrelevant to the issues in the current proceeding. They had to do with the underlying Settlement, not the rate design for the \$10 million. For the reasons more fully set forth in Southern Bell's Motion for Protective Order, CWA's Motion is again fatally flawed and should be rejected.

8. Finally, CWA seeks to compel the production of certain documents. A review of that aspect of CWA's Motion, though, fully discloses why this effort must also fail.

Further, CWA's Request for Documents goes to the heart of the matters being litigated in this dispute, i.e., the legality of the agreement, the negotiation and settlement discussions related to the Stipulation and the Settlement agreements, determination of who would receive the unspecified refunds under the \$10 million settlement and how these funds would be disbursed.

CWA's Motion at 3. From this language, it is clear that CWA is once again seeking discovery related to the underlying Settlement, discovery that is not relevant to this case nor reasonably calculated to lead to relevant information. Only discovery addressing the disposition of the \$10 million meets the standard for discovery and Southern Bell has not objected to such

discovery on the basis of relevance. Therefore, CWA's Motion should again be denied.

WHEREFORE, Southern Bell respectfully requests that the Commission deny the CWA's Motion in all respects.

Respectfully submitted this 14th day of September, 1994.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

Robert G. Beatty
ROBERT G. BEATTY
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c/o Marshall M. Criser, III
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(305) 347-5555

Nancy B. White
NANCY B. WHITE
4300 - 675 W. Peachtree Street
Atlanta, Georgia 30375
(404) 529-5387

Attachment "A"

Legal Department

NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-5387

AUG 15 1994
PSC-RECORDS/REPORTING

August 15, 1994

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Prehearing Statement. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

RECEIVED & FILED
AUG 15 1994
PSC-RECORDS

Nancy B. White
Nancy B. White (01)

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
R. D. Lackey

Attachment "B"

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of
the Revenue Requirements and Rate
Stabilization Plan of Southern
Bell Telephone and Telegraph
Company

) | Docket No. 920260-TL
) |
) | Filed: August 17, 1994
) |

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR PROTECTIVE ORDER

COMES NOW, BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") and, pursuant to Rule 25-22.037 of the Rules of the Florida Public Service Commission ("Commission") and Rule 1.280(c) of the Florida Rules of Civil Procedure, moves the Prehearing Officer to issue a Protective Order preventing the deposition of Mr. Joseph P. Lacher by the Communication Workers of America ("CWA"), or, in the alternative, limiting the scope of the deposition of Mr. Joseph P. Lacher for the reasons set forth below.

1. In connection with the hearing set in the above captioned matter, the CWA has scheduled the deposition of Mr. Joseph P. Lacher, President of Florida - Southern Bell, for August 24, 1994, in Coral Gables, Florida. Mr. Lacher is Southern Bell's chief operating officer for its operations in Florida. As such, his time is subject to many demands both from within and outside the Company. A review of the background of this case, the CWA's Prehearing Statement and the prefiled testimony indicates that Mr. Lacher's deposition has been scheduled merely for purposes of harassment, and that the CWA intends to explore issues that are totally irrelevant to the subject of this docket.

2. The sole factual issue that exists with regard to this matter is the appropriate disbursement of \$10 million in unspecified rate reductions scheduled for 1994, resulting from the Stipulation and Implementation Agreement ("Settlement") entered into by the parties in Docket No. 920260-TL. By Order No. PSC-94-1072-FOF-TL, dated February 11, 1994, the Commission approved the Settlement. This order is a final judgment, upon which all appeal time has run. Thus, any questions concerning the appropriateness of or circumstances surrounding the Settlement are irrelevant to this proceeding. Yet these are the very issues about which Mr. Lacher's knowledge centers. He was not involved in determining the specific rate designs either proposed by Southern Bell or ultimately approved by this Commission. Given Mr. Lacher's position, the demands on his time and his obviously limited knowledge of the facts related to this docket, it would be onerous, burdensome and totally inappropriate to subject him to deposition by the CWA. Courts in Florida have granted protective orders prohibiting the taking of depositions under similar circumstances. Champagne v. Southern Bell Telephone & Telegraph Co., Case No. 90-6603-CIV-Ungaro-Benages (S.D. Fla. 1993) (a copy is attached hereto).

3. In the alternative, the deposition of Mr. Lacher should be limited solely to his knowledge of, if any, of the factual issues related to the \$10 million disbursement. While there are two additional issues listed in this case, they are primarily legal in nature and thus would not be appropriate questions for Mr. Lacher. In any event, the CWA should not be allowed to use

this deposition to go on a fishing expedition into matters which are totally irrelevant to this proceeding. As stated in Rule 1.280 of the Florida Rules of Civil Procedure, discovery is limited to matters which are relevant to the subject matter of the pending action.

Wherefore, Southern Bell requests that the Prehearing Officer issue an Order granting Southern Bell's Motion for Protective Order for the reasons described herein and order that Mr. Lacher's deposition not be taken at all, or, in the alternative, limit the scope of Mr. Lacher's deposition to the subject of the unallocated \$10 million revenue reductions scheduled for and implemented in 1994.

Respectfully submitted this 17th day of August, 1994.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Robert G. Beatty (15)

ROBERT G. BEATTY
J. PHILLIP CARVER
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Nancy B. White (10)

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Atlanta, GA 30375
(404) 529-3862
(404) 529-5387

NT BY:

5-1 3 : 3:18PM :

3058584777

305 385 200:2

8

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 90-6603-CIV-UNGARO-BENAGES

LEONARD CHAMPAGNE,

Plaintiff,

vs.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY,

Defendant.

ORDER

THIS CAUSE came before the Court on Frank Skinner's Emergency Motion for Protective Order filed on May 3, 1993. Upon review of this motion, plaintiff's response thereto, the Court file and applicable law, it is hereby

ORDERED AND ADJUDGED that this motion is GRANTED at this time and until plaintiff has deposed other employees of defendant, Southern Bell Telephone and Telegraph Company, with more knowledge of the facts relevant to this case. Thereafter, and if the testimony of other employees is unsatisfactory or would indicate that Frank Skinner has information relevant to issues in this case, plaintiff can once again re-notice the deposition of this former

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09-17-94 01:13PM FROM BELLSOUTH LEGAL-FLA TO ATLA LEGAL

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0208:3 3

officer of Southern Bell. See Salter v. The Trisha Co., 393 F.2d 549 (5th Cir. 1979); Community Federal Savings & Loan Ass'n v. FHLBB, 96 F.R.D. 619 (D.D.C. 1983).

DONE AND ORDERED in Chambers at Miami, Florida, this 18th day of May, 1993.

Ted E. Sandstra
Ted E. Sandstra
United States Magistrate Judge

Copies furnished to:
All counsel of record

08-17-94 01:12PM FROM BELLSOUTH LEGAL-PLA TO ATLA LEGAL 305 577 4491
020/020
NO.900 P018/022
09/19/94 16:14 BST LEGAL HD -> BST REG TALLAH
R-94%

CERTIFICATE OF SERVICE

**Docket No. 920260-TL
Docket No. 900960-TL
Docket No. 910163-TL
Docket No. 910727-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 17th day of August, 1994 to:

**Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866**

**Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400**

**Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
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Vicki Gordon Kaufman
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**Kenneth A. Hoffman
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Madsen, Lewis & Metz, PA
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**Rick Wright
Regulatory Analyst
Division of Audit and Finance
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**Michael W. Tye
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**Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
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atty for FCTA**

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CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

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