

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF LTD BROADBAND LLC FOR A)
CERTIFICATE OF TERRITORIAL AUTHORITY) Cause No. 45519
FOR COMMUNICATIONS SERVICE PROVIDERS)

**NEW LISBON TELEPHONE COMPANY, INC. AND NEW LISBON BROADBAND
AND COMMUNICATIONS, LLC’S MOTION TO COMPEL DISCOVERY AND
MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY AND EXHIBITS**

New Lisbon Telephone Company, Inc. and New Lisbon Broadband and Communications, LLC (collectively, “New Lisbon”), by counsel, pursuant to 170 IAC 1-1.1-16 and Indiana Rules of Trial Procedure 26 through 37, respectfully requests the Indiana Utility Regulatory Commission (the “Commission”) to order LTD Broadband LLC (“LTD”) to fully respond to certain discovery requests by New Lisbon to LTD in this Cause. New Lisbon further requests the Commission to extend the deadline by which New Lisbon must file its testimony and exhibits in this Cause to a date that is seven (7) days following the provision by LTD of complete and sufficient discovery responses as requested in this motion. In support of this motion, New Lisbon states as follows:

1. On April 7, 2021, New Lisbon served LTD with New Lisbon’s First Set of Requests for Production of Documents and Other Discovery (the “Discovery Requests”). Pursuant to the parties’ agreement and as set forth in the Commission’s April 14, 2021 Docket Entry establishing the procedural schedule for this Cause, LTD was to provide full responses to the Discovery Requests by no later than April 14, 2021.
2. On April 14, 2021, LTD served New Lisbon with its responses to the Discovery Requests, a copy of which is attached hereto as **Exhibit A**; however, LTD’s responses were incomplete and objected to the provision of information that was both relevant and discoverable.

3. Specifically, LTD failed to provide any response to Request Nos. 1.2, 1.3, 1.8, 1.9, 1.26 and 1.27 of the Discovery Requests. In addition, LTD provided deficient and incomplete responses to Request Nos. 1.10, 1.11, 1.14, 1.15, 1.18 and 1.24 of the Discovery Requests. Each of these requests was clearly tied to whether LTD has the financial, managerial and technical ability to provide the communications services for which it seeks a Certificate of Territorial Authority (“CTA”) in this Cause and was reasonably calculated to lead to the discovery of admissible evidence.

4. In evaluating a communications service provider’s request for a CTA, the Commission must review information submitted by the applicant demonstrating the applicant’s financial, managerial and technical ability to provide each communications service identified in the applicant’s application for a CTA. IND. CODE § 8-1-32.5-6(b)(2). The outstanding Discovery Requests for which LTD failed to provide a complete and sufficient responses directly relate to the evaluation of LTD’s financial, managerial and technical ability to provide the requested services, including:

(a) Request No. 1.2 – Seeks identification of real property owned by LTD, which speaks to LTD’s technical and financial ability to provide the services.

(b) Request No. 1.3 – Seeks identification of real property leased by LTD, which speaks to LTD’s technical ability to provide the services.

(c) Request No. 1.8 – Seeks engineering studies provided to LTD, which speaks to LTD’s technical ability to provide the services.

(d) Request No. 1.9 – Seeks feasibility studies provided to LTD, which speaks to LTD’s financial ability to provide the services.

(e) Request No. 1.10 – Seeks map of installed fiber owned by LTD, which speaks to LTD’s technical ability to provide the services.

(f) Request No. 1.11 – Seeks map of installed fiber leased by LTD, which speaks to LTD’s technical ability to provide the services.

(g) Request No. 1.14 – Seeks LTD’s Indiana broadband project buildout timeline, which speaks to LTD’s technical ability to provide the services.

(h) Request No. 1.15 – Seeks organizational charts of LTD’s Indiana broadband project rollout, which speaks to LTD’s technical ability to provide the services.

(i) Request No. 1.18 – Seeks identification of costs to build LTD’s proposed Indiana network, which speaks to LTD’s financial ability to provide the services.

(j) Request No. 1.24 – Seeks identification of costs to build LTD’s proposed networks in other states, which speaks to LTD’s financial ability to provide the services.

(k) Request No. 1.26 – Seeks financial and technical proposals provided to LTD with respect to its proposed network, which speaks to LTD’s technical and financial ability to provide the services.

(l) Request No. 1.27 – Seeks audited and unaudited financial statements of LTD, which speaks to LTD’s financial ability to provide the services.

5. On April 15, 2021, counsel for New Lisbon sent a discovery deficiency letter to LTD’s counsel, setting forth in detail the requests for which LTD had either failed to provide any response or failed to provide a complete and sufficient response. A copy of New Lisbon’s April 15, 2021 correspondence is attached hereto as **Exhibit B**.

6. On April 16, 2021, counsel for the respective parties had a phone call during which New Lisbon’s counsel further explained LTD’s discovery deficiencies and, while maintaining that

all of the Discovery Requests had been reasonably calculated to lead to discoverable evidence, agreed to limit certain Discovery Requests. In subsequent email correspondence, New Lisbon's counsel further clarified the agreed upon limitations and restated the discoverable information still sought by New Lisbon pursuant to the Discovery Requests. A copy of this email correspondence is attached hereto as **Exhibit C**.

7. In his April 16, 2021 email, New Lisbon's counsel stated that if LTD did not provide complete responses to the Discovery Requests by noon on April 19, 2021, New Lisbon would file a motion to compel discovery with the Commission.

8. LTD did not provide any further response to the Discovery Requests by noon April 19, 2021 deadline and, in fact, following the expiration of the deadline, counsel for LTD indicated that LTD would not be provided any additional information in response to the Discovery Requests.

9. 170 IAC 1-1.1-16(a) states that a party shall be entitled to all the discovery provisions of Rules 26 through 37 of the Indiana Rules of Trial Procedure as from time to time amended by the Indiana Supreme Court or General Assembly. Indiana Rule of Trial Procedure 26(F) states that before any party files any motion or request to compel discovery, that party shall: (1) make reasonable effort to reach agreement with the opposing party concerning the matter which is the subject of the motion or request; and (2) include in that motion or request a statement showing that the attorney making the motion or request has made a reasonable effort to reach agreement with the opposing attorneys concerning the matter set forth in the motion or request. Indiana Trial Rule 37(a) states that a party, upon reasonable notice to the other parties and all persons affected thereby, may apply for an order compelling discovery. As described herein, New Lisbon has made efforts to reach an agreement with LTD regarding the provision of responses to the Discovery Requests and now files it motion to compel.

10. Further, the discovery rules are designed to allow a liberal discovery process, the purpose of which is to provide parties with information essential to litigation of issues, to eliminate surprise and to promote settlement. *Rivers v. Methodist Hospitals, Inc.*, 654 N.E.2d 811, 813 (Ind. Ct. App. 1995). Parties may generally obtain discovery regarding any matter relevant to the subject matter involved in the pending action or which appears reasonably calculated to lead to discovery of admissible evidence. *Jacob v. Chaplin*, 639 N.E.2d 1010, 1012 (Ind. 1994).

11. All of the outstanding Discovery Requests relate directly to LTD's financial, managerial and technical ability to provide the communications services for which it seeks a CTA in this Cause and are reasonably calculated to lead to the discovery of admissible evidence. Even so, New Lisbon agreed to limit the scope of the Discovery Requests in order to accommodate LTD's provision of discoverable information. However, LTD has failed or refused to provide the requested information, even as limited by New Lisbon, and should now be compelled to provide complete and sufficient responses to New Lisbon's outstanding Discovery Requests.

12. The parties have agreed upon and entered into a non-disclosure agreement with respect to any information to be provided by LTD in response to the Discovery Requests that is considered confidential, proprietary or trade secret.

13. In agreeing upon a procedural schedule in this Cause, and particularly in agreeing upon New Lisbon's deadline for filing its testimony in this Cause, New Lisbon relied upon LTD's representation that it would provide complete and sufficient discovery responses by the April 14, 2021 deadline. The timely provision of LTD's discovery responses was critical to New Lisbon's agreement to the extremely expedited procedural schedule established for this Cause.

14. The procedural schedule set forth by the Commission in this Cause requires New Lisbon to file its testimony and exhibits with the Commission by April 21, 2021. To date, New

Lisbon has been unable to prepare its testimony and exhibits without the complete and sufficient discovery responses requested from LTD. In agreeing to the procedural schedule, the parties contemplated that New Lisbon would have seven (7) days between the provision of LTD's discovery responses (by April 14, 2021) and the deadline for New Lisbon to file its testimony and exhibits (by April 21, 2021). As of the date of filing this motion, New Lisbon has lost five (5) of the seven (7) days to be used in preparing its testimony and exhibits.

15. Pursuant to Indiana Trial Rule 37, New Lisbon respectfully requests the Commission to order LTD to provide the requested information and to pay New Lisbon's attorney fees incurred in the preparation of this motion. New Lisbon further requests the extension of New Lisbon's deadline to file its testimony and exhibits to a date that is seven (7) days following the provision by LTD of the discovery responses as requested in this motion.

WHEREFORE, New Lisbon requests the Commission to issue an order:

(a) compelling LTD to produce the requested information in response to the Discovery Requests;

(b) imposing sanctions on LTD for its failure to comply with discovery, including attorney fees;

(c) extending New Lisbon's deadline to file its testimony and exhibits in this Cause to a date that is seven (7) days following the provision by LTD of the discovery responses as requested in this motion and further delaying the remainder of the procedural schedule to the extent necessary and appropriate; and

(d) granting all other just and proper relief.

Respectfully submitted,

By: /s/ Jeremy L. Fetty

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LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been electronically served upon the following on April 19, 2021:

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Exhibit A

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**APPLICATION OF LTD BROADBAND LLC FOR A)
 CERTIFICATE OF TERRITORIAL AUTHORITY FOR) CAUSE NO. 45519
 COMMUNICATIONS SERVICE PROVIDERS.)**

LTD BROADBAND LLC’S RESPONSES TO
NEW LISBON TELEPHONE COMPANY, INC.’S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS AND OTHER DISCOVERY

LTD Broadband LLC (“LTD”), by counsel, responds and objects to the First Set of Requests for Production of Documents and Other Discovery propounded by New Lisbon Telephone Company, Inc. (“New Lisbon”) as set forth below.

GENERAL OBJECTIONS:

1. LTD objects to New Lisbon's First Set of Request for Production of Documents and Other Discovery insofar as New Lisbon attempts to impose upon LTD obligations different from, or in excess of, those imposed by the Indiana Rules of Trial Procedure, the Indiana Administrative Code or by the administrative law judge.

2. LTD objects to the Requests to the extent they seek disclosure of private and confidential research, business plans, analysis, strategies, data, customer records and other sensitive commercial information protected from unwarranted disclosure or discovery by applicable law. LTD will not disclose such information until such time as an appropriate confidentiality order has been entered by the Commission and executed by the parties.

3. LTD objects to the Requests to the extent they seek information protected by the attorney-client privilege, the work-product doctrine, or other applicable privileges and protections. LTD hereby claims all applicable privileges and protections to the fullest extent

implicated by the Requests and excludes privileged information and materials from its responses. Any disclosure of such information or materials as a result of LTD's responses or otherwise is inadvertent and is not intended to waive any applicable privileges or protections.

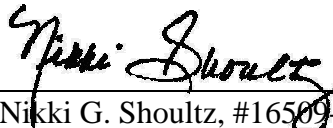
4. LTD reserves all objections as to relevance and materiality. LTD submits these responses and is producing materials in response to the Requests without conceding the relevancy or materiality of the information or materials sought or produced, or their subject matter, and without prejudice to LTD's right to object to further discovery, or to object to the admissibility of proof on the subject matter of any response, or to the admissibility of any document or category of documents, at a future time. Any disclosure of information not responsive to the Requests is inadvertent and is not intended to waive LTD's right not to produce similar or related information or documents.

5. LTD objects to the Requests to the extent they call for identification of, or information contained in or derived from: (a) news articles, trade press reports, published industry services or reference materials, or similar publicly-available sources that are available for purchase or otherwise to New Lisbon; (b) materials that are part of the public record in any legislative, judicial or administrative proceeding and reasonably available to New Lisbon; (c) materials generated by New Lisbon and thus presumably in New Lisbon's own possession, custody or control; (d) materials otherwise available to New Lisbon where response to the Request would impose unnecessary or unjust burdens or expense on LTD under the circumstances; and/or (e) previously submitted or available to New Lisbon in prefiled testimony, pre-hearing data submissions and other documents already filed with the Commission in the pending proceeding.

Subject to and without waiving the foregoing General Objections, each of which are incorporated by reference into the responses below as if fully restated therein, LTD provides the following responses to New Lisbon's Requests. LTD's responses are based on the best information presently available; LTD reserves the right to amend, supplement, correct or clarify answers if other or additional information is obtained, and to interpose additional objections if deemed necessary.

Dated this 14th day of April, 2021.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nikki Shoultz", is written over a horizontal line.

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LTD Broadband LLC

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.1: Please provide the confidential financial statement or balance sheet that was submitted as part of your Application for a Certificate of Territorial Authority for Communications Service Providers in Cause No. 45519.

OBJECTION: LTD objects to Request 1.1 on the grounds that it seeks disclosure of private and highly confidential financial information protected from unwarranted disclosure or discovery. LTD will not disclose such information until such time as an appropriate Non-Disclosure Agreement has been executed by the parties.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD provides **Attachment DR-1.1** which shall be treated as Highly Confidential Information as described in the parties' Non-Disclosure Agreement.

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LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.2: Provide a list of all real property you own and identify any structural improvements located on each such parcel. For purposes of this request, “structural improvements” shall include, without limitation, buildings, structures and communications facilities and/or equipment, including, without limitation, towers, poles, huts, aerial or underground fiber or other lines or conduit and electronic equipment associated with the same.

OBJECTION: LTD objects to Data Request 1.2 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the extent to which an applicant for a Communications Service Provider Certificate of Territorial Authority possesses real estate, structural improvements or equipment. Rather, the Commission reviews an applicant's financial information, which LTD has provided to the Commission and in response to Request 1.1.

RESPONSE: See Objection.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.3: List and provide the physical address for all real property, office space, warehouse space, or operations space that you lease or rent and identify any structural improvements thereon that you own or operate. For purposes of this request, “structural improvements” has the same meaning as in Request 1.2.

OBJECTION: LTD objects to Data Request 1.3 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course, evaluate the physical address for any applicant's real property, office space, warehouse space, or operations space or any structural improvements thereon. Rather, the Commission reviews an applicant's financial information, which LTD has provided to the Commission and in response to Request 1.1.

RESPONSE: See Objection.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
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Request 1.4: What is the physical address of your largest operations or office location and what operations are conducted at said location?

OBJECTION: LTD objects to Data Request 1.4 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course, evaluate the physical address, operations or office location. Rather, the Commission reviews an applicant's managerial, technical and financial information.

RESPONSE: Subject to and without waiver of the foregoing objection, the physical address of LTD's largest operations location is 310 W. 7th Street, Albert Lea, MN 56007 and the building is used as a dispatch facility and for equipment storage.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.5: In each state in which you currently operate, please specifically identify what communications services you provide, either at retail or wholesale, listed by state and the number of customers receiving each service in each state.

OBJECTION: LTD objects to Data Request 1.5 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course, evaluate the communications services or number of customers receiving service in other states. Rather, the Commission reviews the Indiana communications service provider application form to determine whether an applicant has the managerial, technical and financial ability to operate as a communications service provider in Indiana.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD states it currently provides retail communications services in six states (Minnesota, Iowa, Nebraska, South Dakota, Kansas and Wisconsin) serving an aggregate of over 16,000 customers.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.6: How many full-time employees do you employ?

OBJECTION: LTD objects to Data Request 1.6 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course, evaluate the number of full time employees of a communications service provider applicant.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD presently has 147 full-time employees.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.7: How many part-time employees do you employ?

OBJECTION: LTD objects to Data Request 1.7 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course, evaluate the number of part time employees of a communications service provider applicant.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD presently has zero part-time employees.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.8: Please provide all engineering, design or other studies prepared by you or on your behalf that identified or designed network options to provide interconnected VoIP service, dedicated transport telecommunications services and/or facilities-based telecommunications service, internet access service and/or broadband service (the "Services") in Indiana.

OBJECTION: LTD objects to Data Request 1.8 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the engineering, design or other studies prepared by an applicant to provide the communications services for which the applicant seeks a CTA. LTD further objects to Request 1.8 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: See Objections.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.9: Please provide all feasibility, business case or other studies prepared by you or on your behalf that evaluated the projected costs and revenues of any network options you considered for providing the Services in Indiana.

OBJECTION: LTD objects to Data Request 1.9 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the feasibility, business case or other studies prepared by a communications service provider applicant that evaluates the projected costs and revenues of any network options the applicant considered for providing services in Indiana. LTD further objects to Request 1.9 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: See Objections.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.10: Please provide a map or geographic description of all installed fiber owned by you (in any state).

OBJECTION: LTD objects to Data Request 1.10 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the geographic description of installed fiber owned by a communications service provider applicant in any state. LTD further objects to Request 1.9 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, LTD states that it owns or leases fiber across dozens of paths across a 6-state region.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.11: Please provide a map or geographic description of all installed fiber leased by you (in any state) and the term (or expiration date) of the lease agreements under which such fiber is leased.

OBJECTION: LTD objects to Data Request 1.11 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the geographic description of installed fiber owned by a communications service provider applicant in any state or the term of lease agreements under which such fiber is leased. LTD further objects to Request 1.9 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, LTD either owns or has existing relationships with fiber providers that will allow LTD to provision service in Indiana over the coming 10 years.

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New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.12: Do you have any subsidiaries or affiliates that will be involved in or assist you in constructing or installing any facilities in Indiana or in providing any of the Services in Indiana? If yes, for each subsidiary or affiliate that will be involved or assist you, please provide:

- a. Address of its corporate office;
- b. Address or physical location of its primary office or operations center;
- c. Number of full-time employees;
- d. Number of part-time employees;
- e. Whether the subsidiary or affiliate owns any real property;
- f. Whether the subsidiary or affiliate leases any real property, office space, warehouse space or operations space, and if so, the physical address of such property or space;
- g. Whether the subsidiary or affiliate owns or leases any communications facilities or equipment; and
- h. Whether the subsidiary or affiliate provides any Services in Indiana or any other state.

OBJECTION: LTD objects to Data Request 1.12 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the existence, identity or holdings of any subsidiary or affiliate that may assist a communications service provider applicant in providing service in Indiana.

RESPONSE: Subject to and without waiver of the foregoing objection, LTD has no affiliates or subsidiaries.

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Request 1.13: For each location in Indiana that you plan to serve, please provide:

- a. How you have defined "location" (e.g. county, township, census block group, census block);
- b. What physical assets you will construct and install to provide the Services;
- c. What physical assets you will lease to provide the Services;
- d. What services you will resell to provide the Services;
- e. Whether you will construct and install any fiber to provide the Services to subscribers within the location; and
- f. Whether 5G millimeter wave technology will be used to provide the Services to the location.

OBJECTION: LTD objects to Data Request 1.13 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate any of the information described in Data Request 1.13 (a) through (f) to determine whether an applicant has the technical, financial or managerial ability to operate as an Indiana communications service provider.

RESPONSE: Subject to and notwithstanding the foregoing Objection, LTD states that the locations LTD will serve in Indiana will be determined by the Federal Communications Commission and not LTD.

- a. The locations have been determined by the FCC. The FCC has provided guidance on what is an eligible location and what is not in the Public Notice found here:
<https://docs.fcc.gov/public/attachments/DA-16-1363A1.pdf>
- b. LTD will construct and install fiber and optical network terminals at each location to

provide the Services.

- c. LTD may lease fiber if LTD does not own the fiber needed to provision service at a particular location.
- d. LTD will not resell services.
- e. LTD will construct and install fiber to provide the Services to subscribers within certain locations;
- f. 5G millimeter wave technology will not be used to provide the Services to a location.

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LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.14: Please provide a detailed project timeline for serving locations in Indiana that you plan to serve.

OBJECTION: LTD objects to Data Request 1.14 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate a detailed project timeline for serving locations in Indiana that a communications service provider plans to serve. LTD further objects to Request 1.14 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, LTD's project timeline is dependent upon the FCC. LTD will comply with buildout milestones as required by the FCC.

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LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.15: Please provide a Gantt chart or other project management tools that you have developed to manage your rollout of service to locations in Indiana.

OBJECTION: LTD objects to Data Request 1.15 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate Gantt charts or other project management tools that a communications service provider develops to manage rollout of services to locations in Indiana. LTD further objects to Request 1.14 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, see Response to Request 1.14.

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LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.16: Please specifically identify any financial obligations, including, without limitation, loans, notes, letters of credit or state/federal grant or loan program obligations, of LTD related to providing services in Indiana.

OBJECTION: LTD objects to Data Request 1.16 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.16 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.16 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, LTD states that it has no current financial obligations related to providing services in Indiana.

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New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.17: What is the value of the letter of credit that LTD must obtain for the Indiana portion of its RDOF bid?

OBJECTION: LTD objects to Data Request 1.17 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.17 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD states that the value of the letter of credit LTD must obtain for the first year of the Indiana portion of its RDOF bid is \$5,445,691.79 (i.e., one year of support). The amounts for years 2-6 will differ based on whether LTD meets certain optional and mandatory milestones as established by the FCC.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.18: What is the expected cost to build the network in Indiana that will provide the Services committed to by LTD in its Indiana RDOF bid?

OBJECTION: LTD objects to Data Request 1.18 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.18 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.18 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, the expected cost to build the network in Indiana to meet its commitments is greater than the subsidy LTD will receive from the RDOF award.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.19: What is the expected annual cost to the [sic] maintain the network in Indiana that will provide the Services committed to by LTD in its Indiana RDOF bid?

OBJECTION: LTD objects to Data Request 1.19 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.19 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.19 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, LTD relied on its engineering partners to develop maintenance budgets based on LTD's industry experience. The actual annual maintenance cost will be dictated by the need for maintenance and will vary based upon how much of the network is deployed at a given time.

Cause No. 45519
LTD Broadband LLC's Responses To
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Request 1.20: Admit or deny: LTD defaulted in the Connect America Fund Phase II (“CAF II”) auction relating to bids in Nebraska and Nevada. If your answer is anything other than a full admission, please explain.

OBJECTION: LTD objects to Data Request 1.20 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.20 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD admits Request 1.20 and states that following the CAF Phase II Auction, LTD made the prudent business decision not to accept an award for one single, small census block in each of Nebraska and Nevada where LTD decided that the compliance costs would be largely disproportionate to the small area to be served. Rather than accepting the award and defaulting later, LTD chose to pay the FCC a total of \$3,563 rather than spend tens of thousands of dollars on compliance and construction servicing two small areas. Many other CAF Phase II applicants chose to do the same for very small areas. The table below lists the CAF defaults from decisions the FCC released in October 2019. A number of other bidders, including at least one RLEC, made the same choice as LTD to voluntarily default on bids they believed were not viable. Unlike some winning bidders, LTD accepted its CAF obligations in other states and is meeting its deployment obligations.

CAF II Winner	Proposed Forfeiture	Default Reason
Hanson Communications	\$6,000	Due to misunderstanding of post-auction requirements, was not able to timely obtain and submit all documentation required by long form
Total Highspeed, LLC	\$30,000	Did not file long form after winning bids; decided it did not plan to proceed with CAF II
NE Colorado Cellular, Inc.	\$4,383	Inability to build out because it could not timely obtain ETC designation in Kansas
Crocker Communications	\$6,000	Voluntary withdrew because project no longer economically feasible.
MGW Networks, LLC	\$6,000	Voluntarily withdrew because not in best economic interest to move forward
Fidelity Communications Company	\$3,641	Voluntarily withdrew because could not find unserved locations in the CBG and did not make economic sense to proceed
LTD Broadband, LLC	\$3,563	Did not obtain ETC Designation for two CBGs
Workable Programs & Systems, Inc.	\$16,200	Unable to obtain the Letter of Credit Commitment Letter
Pine Cellular Phones, Inc.	\$16,750	Voluntarily withdrew for "economic reasons"
Farmers Mutual Telephone Company	\$3,000	Voluntarily withdrew because 95 of 98 winning areas were already in ILEC service territory and default was most cost-effective resolution
Townes Wireless, Inc.	\$9,504	Financial difficulties supporting the winning areas
Johnson Telephone Company	\$3,000	No explanation given
Syncwave, LLC	\$1,242	Did not file its long form

Cause No. 45519
LTD Broadband LLC's Responses To
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Request 1.21: Admit or deny: LTD had to request a waiver of the FCC's requirement to provide audited financials for the CAF Phase II auction because it was a small business with limited administrative resources and its efforts to engage accountants within the required timeframe were unsuccessful. If your answer is anything other than a full admission, please explain.

OBJECTION: LTD objects to Data Request 1.21 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.21 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD denies Request 1.20 and states that LTD did not request a waiver of the FCC's audited financial requirement because LTD "was a small business with limited administrative resources." LTD requested a short delay to accommodate the time required by LTD's auditing firm to complete the audited financial statements for the relevant time period. The FCC granted LTD's waiver request and LTD completed the audit within the revised timeframe.

Cause No. 45519
LTD Broadband LLC's Responses To
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Request 1.22: Admit or deny: LTD has been denied eligible telecommunications carrier (“ETC”) designation in Nevada and Nebraska. If your answer is anything other than a full admission, please explain.

OBJECTION: LTD objects to Data Request 1.22 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information listed in Request 1.22 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD denies the allegation in Request 1.22. LTD did not apply for ETC designations in Nevada or Nebraska.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
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Request 1.23: Admit or deny: The Better Business Bureau gives LTD's operations in Minnesota a failing "F" rating. If your answer is anything other than a full admission, please explain.

OBJECTION: LTD objects to Data Request 1.23 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information described in Request 1.23 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana.

RESPONSE: Subject to and without waiver of the foregoing Objection, LTD admits Request 1.23 and states that the BBB rating is the result of 14 unverified and unspecified customer complaints in Minnesota. LTD has been the subject of approximately 81 customer reviews on Google, where LTD has a 4.44-star rating. Notably, on Google, New Lisbon Telephone Company has a 3.4-star rating based on 23 reviews with multiple 1-star reviews highlighting New Lisbon's dismal service and exorbitant prices. See **Attachment DR-1.23**. LTD takes its customer service obligations seriously. If actual, verified concerns arise based on evidence in Indiana, this Commission has authority to investigate and remedy them – but it should not deny LTD's CTA application on the speculation that LTD will not render satisfactory service quality and customer service.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
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Request 1.24: What are the estimated construction costs of the networks required to be built in all 15 of the states in which LTD was awarded RDOF support?

OBJECTION: LTD objects to Data Request 1.24 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information described in Request 1.24 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.24 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: Subject to and without waiver of the foregoing Objections, the estimated construction cost of the networks required to be built in all 15 of the states in which LTD was awarded RDOF support exceeds the amount of the aggregate RDOF funding awarded to LTD. LTD will not use RDOF support from Indiana to fund building in other states. The FCC will measure annual compliance and the spending level at the state level. Additionally, the state commission will certify to the FCC the amount of capital spending in the prior year and indicate whether resources are sufficient to meet building needs for the coming year.

Cause No. 45519
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Request 1.25: Please explain how LTD will allocate the total amount of RDOF support awarded in all 15 states, including whether the amounts awarded for each of the 15 states will be used to build the network and provide the required Services only in that state.

OBJECTION: LTD objects to Data Request 1.25 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information described in Request 1.25 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.25 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: See Objections. Subject to and without waiver of the foregoing Objections, LTD will allocate RDOF support as required by the FCC. The FCC will measure annual compliance and spending at the state level. Additionally, the state commission will certify to the FCC the amount of capital spending in the prior year and indicate whether resources are sufficient for the coming year. LTD will not use RDOF support from Indiana to fund building in other states.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
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Request 1.26: Please provide all financial and technical proposals related to LTD's RDOF bids.

OBJECTION: LTD objects to Data Request 1.26 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information described in Request 1.26 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.26 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery.

RESPONSE: See Objections.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
For Production of Documents and Other Discovery

Request 1.27: Please provide all of LTD's audited and unaudited financial statements for the past two years.

OBJECTION: LTD objects to Data Request 1.27 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information described in Request 1.27 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Request 1.27 on the grounds that it seeks disclosure of trade secret and highly confidential information protected from unwarranted disclosure or discovery. If requested, LTD will supply its audited and unaudited financial statements to the Commission subject to a finding of confidentiality.

RESPONSE: See Objections.

Cause No. 45519
LTD Broadband LLC's Responses To
New Lisbon Telephone Company, Inc.'s First Set of Requests
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Request 1.28: Please provide the jurisdiction and docket or cause number of any current proceedings or proceeding in the past three years in which LTD's financial, managerial or technical ability to provide communications services has been challenged.

OBJECTION: LTD objects to Data Request 1.28 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In particular, Indiana law does not require, nor does the Commission as a matter of course evaluate the information described in Request 1.28 in determining whether a communications service provider has the financial, managerial and technical ability to render service in Indiana. LTD further objects to Data Request 1.28 on the grounds that the information requested is in the public domain and is equally accessible to New Lisbon as it is to LTD.

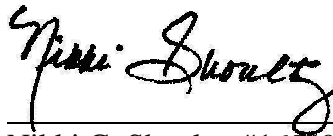
RESPONSE: Subject to and without waiver of the foregoing objection, other losing bidders and their state trade associations have filed proceedings at the FCC, pending as AU Docket No. 20-34, WC Docket No. 19-126 and WC Docket No. 10-90; and at the Minnesota Public Utilities Commission in Docket No. P999/CI-21-86 and P6995/M-21-133. The proceedings were initiated by disappointed RLEC bidders seeking denial of LTD's ETC designation and/or rescission of LTD's RDOF awards and LTD is vigorously opposing the baseless challenges.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *LTD Broadband LLC's Responses to New Lisbon Telephone Company, Inc.'s First Set of Requests for Production of Documents and Other Discovery* has been served upon the following counsel of record electronically this 14th day of April, 2021:

Karol Krohn
Indiana Office of Utility Consumer Counselor
PNC Center, Suite 1500 South
115 West Washington Street
Indianapolis, IN 46204
kkrohn@oucc.IN.gov
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Jeremy L. Fetty
Erin C. Borissov
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Nikki G. Shoultz, #16509-41

Exhibit B

PARRRICHEY
FRANDSEN PATTERSON KRUSE

INDIANAPOLIS
CAPITAL CENTER NORTH
251 N. ILLINOIS STREET, SUITE 1800
INDIANAPOLIS, IN 46204
PHONE: 317.269.2500
FAX: 317.269.2514

JEREMY L. FETTY
jfetty@parrlaw.com

April 15, 2021

Via Email: NShoultz@boselaw.com

Nikki G. Shoultz
Bose McKinney & Evans
111 Monument Circle - Suite 2700
Indianapolis, IN 46204

Re: Application for LTD Broadband LLC for CTA
Discovery Deficiency Letter
Cause No.: 45519

Dear Ms. Shoultz

This letter is being sent pursuant to Indiana Trial Rule 26(F) to resolve a discovery dispute. It is our hope to reach a resolution on this discovery dispute and to establish a prompt plan for your client to produce relevant and discoverable information without the need for our client, New Lisbon Telephone Company, Inc. and New Lisbon Broadband and Communications, LLC's (collectively "New Lisbon") to seek the Indiana Utility Regulatory Commission's ("Commission") intervention via a Motion to Compel.

Based on review of your client's responses to New Lisbon's first set of Requests for Production of Documents and other discovery, it is clear that your client has failed to produce all relevant and discoverable information requested. LTD failed to provide any response to Requests 1.2, 1.3, 1.8, 1.9, 1.26, and 1.27. LTD has provided deficient and incomplete responses to Requests 1.8, 1.10, 1.11, 1.14, 1.15, 1.18 and 1.24. Each of these requests is clearly tied to whether LTD has the financial, managerial, and technical ability to provide the communication services for which it seeks a Certificate of Territorial Authority and is reasonably calculated to lead to the discovery of admissible evidence.

Nikki Shoultz, Esq.
April 15, 2021
Page 2

Please let me know when you can be available for a call to discuss these matters. With the compressed time frame, we need updated responses by close of business April 16, 2021 or we will be forced to file a Motion to Compel with the Commission.

Sincerely,

PARR RICHEY FRANSEN PATTERSON KRUSE LLP

By: 
Jeremy L. Fetty

—

JLF/cch
1638839

Exhibit C

From: [Jeremy Fetty](#)
To: ["Shoultz, Nikki"](#)
Cc: [Coran, Steve](#); [Krohn, Karol](#); [Aleasha Boling](#); [Erin Borissov](#)
Subject: RE: New Lisbon -- Letter to Nikki Shoultz re_ discovery deficiency.PDF
Date: Saturday, April 17, 2021 2:00:58 PM
Attachments: [image001.png](#)

Nikki:

I did say that on the call but upon reviewing them I thought it was obvious that those questions were not answered. But to be clear:

1.8 – LTD provided no response other than “See Objections”

1.15 – Please provide a Gantt chart or other project management tools that you have developed to manage your rollout of service locations in Indiana. LTD response is see Response to Request 1.14.

1.14 response is the LTD’s project timeline is dependent on FFC and that it will comply with FCC building milestones. That is not responsive to request for Gantt chart or project management tools that LTD has developed to manage rollout of service in Indiana. I suspect the answer is “None” and that is why the question was dodged but we need to get that answer.

1.18 – What is the expected cost to build the network in Indiana that will provide the Services committed to by LTD in its Indiana RDOF build. The only response is the cost will be greater than subsidy LTD will receive from RDOF award. We have asked for expected or estimated costs of the build not whether or not the build is expected to cost more than the RDOF subsidy.

1.24 – What are estimated costs of the networks required to built in all 15 of the states which LTD was awarded RDOF support? Similar to 1.18 indicated that builds would cost more than subsidies and that LTD will not use Indiana awarded fund for Indiana in other states. However what we want are total estimated costs for the networks required in all of the 15 states in which LTD was awarded RDOF support.

Thanks

Jeremy

From: Shoultz, Nikki <NShoultz@boselaw.com>

Sent: Friday, April 16, 2021 5:39 PM

To: Jeremy Fetty <jfetty@parrlaw.com>

Cc: Coran, Steve <SCoran@lrmansenter.com>; Krohn, Karol <kkrohn@oucc.IN.gov>; Aleasha Boling <aboling@parrlaw.com>; Erin Borissov <EBorissov@parrlaw.com>

Subject: RE: New Lisbon -- Letter to Nikki Shoultz re_ discovery deficiency.PDF

Jeremy,

Thanks for your email. Perhaps I misunderstood, but I thought in our conversation we agreed that for responses that you found to be deficient or incomplete, you were going to tell us how/why it was

deficient and what specific information you are seeking so that we have a better idea of what you are looking for. That would apply to 1.8, 1.15, 1.18, and 1.24. We believe this would be very helpful in determining whether there is some additional level of information that we can share. Thanks, - Nikki

Nikki Gray Shoultz

Bose McKinney & Evans LLP

111 Monument Circle | Suite 2700 | Indianapolis, Indiana 46204

NShoultz@boselaw.com | P 317-684-5242 | F 317-223-0242

Assistant Contact | Lisa A. Bood | lbood@boselaw.com | P 317-684-5176 | F 317-223-0176

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From: Jeremy Fetty <jfetty@parrlaw.com>

Sent: Friday, April 16, 2021 4:51 PM

To: Shoultz, Nikki <NShoultz@boselaw.com>

Cc: Coran, Steve <SCoran@lrmansenter.com>; Krohn, Karol <kkrohn@oucc.IN.gov>; Aleasha Boling <aboling@parrlaw.com>; Erin Borissov <EBorissov@parrlaw.com>

Subject: RE: New Lisbon -- Letter to Nikki Shoultz re_ discovery deficiency.PDF

Nikki and Steve:

In follow up to our call today and in an attempt to resolve our discovery despite in good faith, although we believe all our requests to be reasonably calculated to lead to discoverable evidence, we have limited our discovery deficiency request to the following requests:

- 1.3 – We will limit this request to physical address for all office or operations space you own or lease (relevant to technical ability to provide services set forth in CTA application)
- 1.8 – (relevant to technical and managerial ability to provide the services set forth in the CTA application)
- 1.9 - (relevant to financial, technical and managerial ability to provide the services set forth in the CTA application)
- 1.15- Answer provided is not responsive to question (relevant to technical and managerial ability to provide the services set forth in the CTA application)
- 1.18 –Answer provided is not responsive to question (relevant to financial, technical and managerial ability to provide the services set forth in the CTA application)
- 1.24 - Answer provided is not responsive to question (relevant to financial, technical and managerial ability to provide the services set forth in the CTA application)
- 1.26 - (relevant to financial, technical and managerial ability to provide the services set forth in the CTA application)
- 1.27 – We will limit this request to the most years audited and unaudited financials (relevant to financial ability to provide the services set forth in the CTA application)

Please provide complete responses no later Monday April 19, 2021 12 p.m. If we do not get a timely response, we will be forced to promptly file a motion to compel and likely need to try and extend the

procedural schedule as the requested information is critical to our case. Let me know if you would like to discuss.

Thanks

Jeremy

Jeremy L. Fetty | Partner

PARRRICHEY

251 N. Illinois Street, Suite 1800 | Indianapolis, Indiana 46204

Phone: 317-269-2500 | www.parrlaw.com

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From: Shoultz, Nikki <NShoultz@boselaw.com>

Sent: Thursday, April 15, 2021 4:46 PM

To: Jeremy Fetty <jfetty@parrlaw.com>

Cc: Coran, Steve <SCoran@lermansenter.com>

Subject: FW: New Lisbon -- Letter to Nikki Shoultz re_ discovery deficiency.PDF

Jeremy,

In response to your letter, we could be available for a call tomorrow afternoon. Does 2:30pm eastern work for you?

Thanks,

Nikki Gray Shoultz

Bose McKinney & Evans LLP

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Assistant Contact | Lisa A. Bood | lbood@boselaw.com | P 317-684-5176 | F 317-223-0176

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From: Candice Holcomb <CHolcomb@parrlaw.com>

Sent: Thursday, April 15, 2021 4:06 PM

To: Shoultz, Nikki <NShoultz@boselaw.com>

Cc: Jeremy Fetty <jfetty@parrlaw.com>

Subject: New Lisbon -- Letter to Nikki Shoultz re_ discovery deficiency.PDF

Good Afternoon:

Please see the attached correspondence from Jeremy Fetty. After your review, please do not hesitate to contact our office at (317) 269-2500.

Candice C. Holcomb

Business Organizations Paralegal

251 N. Illinois Street, Suite 1800 | Indianapolis, Indiana 46204

Phone: 317-269-2500 | www.parrlaw.com



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