

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

Docket No.: W-1297, Sub 14

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

<p>MRT-1, LLC,</p> <p style="text-align: center;">Complainant,</p> <p>v.</p> <p>HARKERS ISLAND SEWER COMPANY,</p> <p style="text-align: center;">Respondent.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>RESPONDENT HARKERS ISLAND SEWER COMPANY’S RESPONSES TO COMPLAINANT’S FIRST SET OF INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS, AND REQUESTS FOR ADMISSION</p>
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TO: Andrew D. Irby
Attorney for Complainant
ROBERSON HAWORTH & REESE, P.L.L.C.
N.C.S.B. No. 35353
Post Office Box 1550
High Point, NC 27261

NOW COMES **Respondent Harkers Island Sewer Company (HISCO)** and responds to Complainant’s First set of Interrogatories, and Request for Production of Documents as follows:

GENERAL OBJECTIONS

Respondent HISCO objects to all facts assumed in the definitions section and in each stated interrogatory, and request for production. Respondent further objects to all discovery requests to the extent that such are unduly burdensome. Respondent further objects to all discovery requests that have the intent and /or effect of harassment. Respondent further objects to all discovery requests couched in terms such as “all information” or “all communications” on the grounds that such are factually overbroad as a matter of the law. If Defendant desires specific information, Respondent HISCO stands ready, willing and able to respond to may such request.

1. “Complainant” shall refer to MRT-1, LLC.
2. “Respondent” or “HISCO” shall refer to Harkers Island Sewer Company.
3. “Date” when used in an interrogatory or requests for admission shall mean exact

date. When you do not know the exact date, “date” shall mean an approximate date or range of time.

4. “Specify” or “describe” shall mean to give a full and complete narrative account of the information requested without omission of any relevant facts, whether deemed material by you or not, and without omission of information that could lead to relevant facts, all within the spirit of the discovery rules that these interrogatories and requests for admission will elicit all information, documents, communications and opinions possessed by or known to you in connection with the instant litigation.

5. “Documents” or “records” shall be defined in the customary broad sense of such words as defined by Rule 34(a) of the North Carolina Rules of Civil Procedure, including, by way of illustration and not limitation, the following items, whether printed or reproduced by any process or written and/or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: notes; correspondence; communications of any nature; telegrams; memoranda; notebooks of any character; summaries or records of personal conversations; diaries; reports; publications; invoices; specifications; charts; drawings; photographs; sketches; minutes or records of meetings; reports and/or summaries of interviews; reports and/or summaries of investigations; agreements; reports and/or summaries of negotiations; drafts of any document, and revisions of drafts of any documents; photographs; motion pictures; tape or video recordings; data stored in any form of electronic or other media; electronic mail; text or iMessages; and/or other data compilations of any kind.

6. “Identify” or “identity” when used with respect to an individual person means state his or her full name, relationship to you, current residence and business address, current residence and business phone numbers, present or last known position and business affiliation and, if different, position and business affiliation at the time to which the interrogatory refers.

7. “Identify” or “identity” when used with respect to a corporation, partnership, or other business entity, or any governmental department or entity, means to state such entity’s name, business address, and relationship to you, if any.

8. “Identify” or “identity” when used with respect to a document means to provide a sufficiently specific description of the document, sufficiently specific to satisfy a request for production pursuant to Rule 34 of the North Carolina Rules of Civil Procedure and including the following information:

- (a) the type of document, if any;
- (b) the date of the document, if any;
- (c) the name or names and business address or addresses of the signer or signers of the document itself;
- (d) the name or names and address or addresses of the person or persons to whom the document is addressed, if any, including all persons to whom copies are provided;
- (e) a brief summary of the subject matter of the document;

- (f) the present whereabouts of the document and the name and address of the custodian thereof; and
- (g) a statement of whether you are willing to voluntarily produce such document.

9. "Person" shall mean any mean any individual of either sex, any firm, corporation, unincorporated association, governmental department or agency or other organization.

10. "Relates to," "related to," "relating to" or "regarding" means documents or information that support, constitute, form the basis of, memorialize or evidence the information otherwise described or requested in the interrogatory or requests for admission.

11. "You" or "your" shall refer to "Respondent" as defined above.

12. All initially capitalized terms not specifically defined herein shall have the same meaning as given the identical terms in the Complaint filed in this cause (the "Complaint").

REQUESTS FOR ADMISSION

Pursuant to the provisions of Rule 36 of the North Carolina Rules of Civil Procedure, Complainant hereby requests that you admit, for the purposes of this action only, the truth of the matters set forth below.

1. Admit that you signed the certification on the plat map recorded in Plat Book 32, at Page 403, Carteret County Registry, providing that "I hereby certify that the lots shown on this plat will be served by Harkers Island Sewer Company (HISCO) for a new sewer system and that said system has been installed in an acceptable manner and in accordance with the requirements of Carteret County and the State of North Carolina."

RESPONSE:

Subject to the above-stated General Objections, Admitted.

2. Admit that the foregoing certification on the plat map recorded in Plat Book 32, at Page 403, Carteret County Registry, was signed by Michael Laws as Authorized Agent for (HISCO).

RESPONSE:

Subject to the above-stated General Objections, Admitted.

3. Admit that a new sewer system had not been installed, inspected and connected at the time of the recordation of plat map recorded in Plat Book 32, at Page 403, Carteret County Registry, as you indicated.

RESPONSE:

Subject to the above-stated General Objections, Denied. Responding further, the term

“new sewer system” in this context necessarily referred to the installed collection system and force main, thus providing sewer service via the HISCO system. (See attachment “A”). At all times relevant to this matter, HISCO owned and operated existing, permitted sewage treatment and disposal systems. New prospective system users must, as required by NCUC rules, pay in advance for any needed expansions of the HISCO system needed to meet proposed additional loading demands on HISCO’s existing wastewater treatment and disposal system.

4. Admit that no performance bond was provided to Carteret County to ensure the installation and connection of a sewer system as certified on the plat map recorded in Plat Book 32, at Page 403, Carteret County Registry.

RESPONSE:

Subject to the above-stated General Objections, Admitted in part; except as expressly Admitted, Denied. HISCO always has been required to meet NCUC bond requirements, and continues to do so. To the knowledge of HISCO, no specific, separate performance bond was ever required by the NCUC with specific reference to specific collection and force main improvements installed at James Creek. At one point the NCUC did require an additional \$10,000.00 in performance bonding which may have encompassed in part the provision of services to James Creek. HISCO met this additional bonding requirement and was granted this additional franchise territory.

5. This request for Admission is in reference to Paragraph 12 of your response to the Complaint, which additionally references Exhibit B attached to the Complaint. Admit that no permits were obtained prior to the installation of the wastewater infrastructure (including service lines and meter connection boxes at each individual lot) that were installed at the James Creek Subdivision.

RESPONSE:

Denied. HISCO always has obtained and held permits and approvals needed for wastewater system treatment and disposal, as required by state and local regulators. See also attachment “A.”

6. This request for Admission is in reference to the 20 page document enclosed herewith (NCDENR Permit #WQ0024023). Admit that Phase I of Permit #WQ0024023 includes providing wastewater treatment services to 22 lots within the James Creek Subdivision via force main to the 10,080 GPD Westbay Wastewater Treatment Plant.

RESPONSE:

Subject to the above-stated General Objections, Admitted in part and except as expressly Admitted, Denied. It is Admitted that at various points in time HISCO’s *permitted* waste treatment capacity as defined by the relevant state and local regulators was linked to the Westbay WWTP; however, that is a different issue from actual wastewater treatment and disposal, which of course HISCO strives to provide in the most cost effective manner. As documented elsewhere in these discovery responses, HISCO currently provides actual wastewater treatment and disposal capacity to all of its customers via the Harkers Village WWTP and related infrastructure.

7. This request for Admission is in reference to the 20 page document enclosed herewith (NCDENR Permit #WQ0024023). Admit that Phase III of Permit #WQ0024023 contemplated construction of a new WWTP at James Creek under Permit #WQ0034190.

RESPONSE:

Denied.

8. This request for Admission is in reference to the 20 page document enclosed herewith (NCDENR Permit #WQ0024023). Admit that it was your intent to commence providing wastewater treatment services to 22 lots within James Creek Subdivision prior to constructing a new treatment plant within the James Creek Subdivision via force main to the existing WWTP located at Westbay.

RESPONSE:

Subject to the above-stated General Objections, Admitted. See also all other discovery responses.

9. This request for Admission is in reference to the 20 page document enclosed herewith (NCDENR Permit #WQ0024023). Admit that no force main lines were ever installed connecting ay lots within James Creek Subdivision with the Westbay WWTP.

RESPONSE:

Denied.

10. Admit that you have extended wastewater treatment service within your permitted capacity to other lots within other subdivisions that were initially permitted or designated for James Creek subdivision.

RESPONSE:

Subject to the above-stated General Objections, it is Admitted that 10,000gpd of capacity initially was permitted and designated to serve the James Creek properties. However, when the then-developer failed to pay for construction of needed additional wastewater treatment and disposal capacity, coupled with DHHS taking over regulatory control of the entire HISCO system, thus depriving HISCO of the benefits of DWR's 80/20 rule, HISCO lost the capacity to serve James Creek with its then-existing *regulator-permitted* capacity and HISCO further took reasonable actions to serve its other, *paying* customers over time. Additionally, when the bank foreclosed, HISCO was forced to relinquish 38,600gpd of permitted capacity (see attachments "A" and "D").

11. Admit that there is no water connection installed on lots within James Creek Subdivision that connect such lots with HISCO.

RESPONSE:

Subject to the above-stated General Objections, it is Admitted that, as stated on the face of the recorded plat, Phase I of James Creek was to be served by wells. It is further admitted that HISCO is not a water supply utility. Except as expressly admitted, Denied.

12. Admit that after the foreclosure of James Creek subdivision had been commenced, Michael Laws or one of his companies or affiliates timbered the James Creek Subdivision, or caused such to be timbered.

RESPONSE:

Subject to the above-stated General Objections, Admitted.

13. Admit that the timbering of the James Creek subdivision hinders the ability of the present owner of the James Creek subdivision from installing a viable on site wastewater treatment plant or other system to treat wastewater.

RESPONSE:

Denied. Answering further, it is Admitted that the then considered high infiltration discharge waste treatment disposal option requires land clearing; answering further, it is admitted that some *subsurface* waste treatment system options *might* be impacted by prior timbering operations. Except as expressly admitted; Denied.

INTERROGATORIES

1. Please identify the person or persons providing the answers, or assisting in providing the answers, to these interrogatories on your behalf.

ANSWER:

Mike Laws, using information and engineering advice previously provided by licensed professional engineer Bill Forman, and with legal counsel input from HISCO's attorney Clark Wright.

2. Please identify each and every person having any information whatsoever supporting or relating to the allegations and assertions in any of the pleadings in this matter.

ANSWER:

Mike Laws; Michael Price; Bill Forman, P.E.; various state and local regulators; various bank officials at now closed Bank of North Carolina, and then Pinnacle Bank, and also Wells Fargo bank.

3. For each and every person identified in Interrogatory No. 3, please *describe with particularity* the substance of that person's knowledge or information.

ANSWER:

Mike laws, HISCO Manager, and dissolved BLE Development LLC Manager.
Bill Forman Civil engineer which designed and permitted the subdivision and sewer system.

Michael Price – prior partner in BLE and minority partner in HISCO;
Steve Berkowitz, long time NC DHHS regulator
Various County Health Department Officials (see provided documents and public records)
Jim Gregson, formerly with DWR
Representative Pat McElraft, who HISCO contacted seeking legislative relief from the catch-22 of having its system regulated in part by DWR and in part by DHHS-County officials, with conflicting rules and policies related to the relationship between permitted system capacity versus actual treatment volumes, leading to conflicting limitations on connecting new users.

4. Please identify each person you intend or expect to call as an expert witness at the trial of this action and state:

- (a) the subject matter upon which the expert is expected to testify;
 - (b) the substance of the facts and opinions to which the expert is expected to testify;
- and
- (c) a summary of the grounds for each opinion.

ANSWER: HISCO considers Mike Laws as an expert by experience on the functioning of its wastewater treatment and disposal systems, NCUC requirements and various state and local regulations associated with HISCO's WWTP systems. In addition, Bill Forman of Arendell Engineering. HISCO believes that Mr. Forman is well qualified to testify as to all aspects of its wastewater treatment and disposal systems, the history of such, as well as the history of HISCO's regulatory compliance with DWR, DHHS and the County. Mr. Forman also is qualified to provide expert guidance on how prior developers and the NPS have paid in advance for system improvements needed to add additional capacity. Mr. Forman also has assisted HISCO in providing needed information to the NCUC, which in every instance issued approvals for the adding of significant additional new service territories.

5. For each request for admission served herewith that you denied or failed to unconditionally admit, please describe in complete and factual detail why you denied or failed to unconditionally admit such request. Please identify any documents that support your explanation.

ANSWER: See detail contained in admission responses; see attached documents; should Complainant have specific additional questions, HISCO will do its best to promptly answer. In addition, see the following:

RA 3 - The collection system within JC was installed at the time of plat recordation. The collection system connecting JC and WB was installed and connected at the time of recordation. Both sections had been field tested and were ready for engineer testing and certification when recordation occurred. Unfortunately, no development occurred in JC so the current condition of these facilities may well have deteriorated to some extent.

RA 5 - The collection system and treatment facilities were permitted at the time of recordation. See attached permit No. WQ0034190. (See attachment "A")

RA 7 – BLE and HISCO did not contemplate building a WWTP and system within JC; that was the situation until unilateral foreclosure by the bank damaged HISCO's ability to honor its permit terms, required HISCO to amend its permit by deleting the various collection facilities previously installed within JC, etc.

RA 9 - The JC collection system was permitted and installed per the design criteria with numerous onsite inspections by a licensed civil engineer. (attachment "A")

RA 13 - In HISCO's opinion, timbering has no bearing on the soils' ability to be used for drain fields, and did not constitute excavation or disturbance of natural soil conditions at JC.

6. Please identify the approved total capacity (in gallons per day) of the Harkers Village WWTP and the Westbay WWTP.

ANSWER:

Total PERMITTED capacities: HV 60,000gpd WBWWTP 20,000gpd (Total 80,000gpd)

7. Please identify the existing constructed capacity (in gallons per day) of the Harkers Village WWTP and the Westbay WWTP.

ANSWER:

40,000gpd.

8. Please identify the total excess or unallocated permitted capacity (in gallons per day) of HISCO's wastewater treatment plants.

ANSWER:

0gpd.

9. Please identify all open or pending permits regarding or in any way relating to your wastewater treatment facilities. Your response to this interrogatory should include any permit renewals, and the termination date of any such pending permits, and identifying whether NCDENR Permit #WQ0024023 expired on December 31, 2019.

ANSWER:

Renewed until 2026 Permit no. WQ0024023 (attached "B"); see also other produced documents re prior permits. HISCO currently is working with its engineer (Forman) and DHHS

regulators (Berkowitz) to implement various required maintenance, repairs and upgrades to improve system functions/regulatory compliance.

10. This interrogatory is in reference to Paragraph 25 of HISCO's Corrected and Revised and Responses to the Complaint. Please identify the "several different ways" for the creation of additional available permitted sewage handling capacity. For each method of increasing additional available permitted sewage handling capacity, please identify:

- a. The specific methods available to increase additional available permitted sewage handling capacity (e.g., construction of a new wastewater treatment facility, commencing operations at Westbay WWTP, expanding the leach field at HISCO's Harkers Village WWTP;
- b. The anticipated increase (in gallons per day) that each method may bring;
- c. The anticipated up-front cost to MRT-1, as owner of James Creek, for each method put forward in order to support the development of 8 residential lots within James Creek.
- d. The anticipated up-front cost to MRT-1, as owner of James Creek, for each method put forward in order to support the development of 22 residential lots within James Creek.
- e. The anticipated up-front cost to MRT-1, as owner of James Creek, for each method put forward in order to support the development of 80 residential lots within James Creek.

ANSWER:

- a. The only method to serve JC is to design, permit, and build increased capacity equal to the amount HISCO lost due to unilateral bank foreclosure, conducted after HISCO ***expressly notified the bank*** of the major adverse consequences such would cause in terms of HISCO's permits and ability to provide service to James Creek, and the taking over of HISCO's entire system by DHHS (thus losing the benefits of DWR's 80/20 rules). Starting up Westbay facility has no bearing on permitted capacity, but only increases HISCO's operating cost for no reason. Expanding leach fields does not constitute an increase in permitted capacity.
- b. The required 38,600gpd - the same amount lost due to permit cancellation as a result of inaction by developer/owner, and/or bank foreclosure proceedings. (see, also, attachment "D")
- c. There is no credible way to design, permit, and build for 8 lots in this subdivision in a cost effective manner.

- d. In HISCO's and its engineer's experience, 7,920gpd (22x360gpd) expansion would not be cost effective for the developer/current landowners to attempt, especially trying to utilize the old WB waste treatment facility.
- e. To be determined by civil engineer and soil scientist at the cost of developer/land owner. See attachments "E" and "F" for examples of other existing HISCO customers who made the required up front monetary contributions required to serve their subdivisions. Note that attachment "F" is an example of costs developers incurred offsite and were included in NCUC application to serve their projects.

11. Please identify the most efficient manner to commence providing wastewater treatment services to lots within the James Creek Subdivision given the existing permits, existing facilities, and existing infrastructure in ground. Please provide such analysis separately for 8 lots, 22 lots, and 80 lots within the subdivision.

ANSWER:

Not possible to serve any new customer demand within current permits and DHHS imposed limitations; would require modifications or new permits as defined and required by state and local regulators, and as defined and required by licensed PE input, with all being necessary and customary relative to HISCO's consistent past track record of adding significant new users to its system. In HISCO's opinion, given these realities, it is not cost-effective to attempt to serve only 8 new home users. The only cost effective solution is to design and pay up front for all needed treatment and disposal capacity for full buildout, working with HISCO. As previously noted by HISCO on multiple occasions, working with HISCO for a proper system upgrade also will free up approximately seven additional lots within the JC property, thus significantly reducing the owner's net sewage treatment and disposal costs.

12. Please identify the most cost effective manner to commence providing wastewater treatment services to lots within the James Creek Subdivision given the existing permits, existing facilities, and existing infrastructure in ground. Please provide such analysis separately for 8 lots, 22 lots, and 80 lots within the subdivision.

ANSWER:

See Answer immediately above.

13. Please identify the dates that wastewater services by HISCO were commenced for each subdivision, community, recreational vehicle park, seashore facilities, or commercial entity commenced. For each such subdivision, community, recreational vehicle park, seashore facilities, or commercial entity identified, please provide the reduction in available capacity resulted following commencement of such service.

ANSWER:

NPS phase 1 finalized 3/1/2016 (2,800 gpd design capacity)
NPS Phase 2, Mormon Church, Ice Cream Shop 12/2017 (4,275gpd design capacity).
Cape Pointe Subdivision 4/2017 (10,500gpd).
Harkers Is. R/V Park 4/2017 (14,400gpd).
BetheBay Subdivision 4/2017 (4,320gpd). (attachment "C"),(attachment "G")

14. Please identify all plans for expansion of HISCO's permitted capacity:

- a. Over the next 12 months;
- b. Over the next 3 years;
- c. Over the next 10 years.

Your response should include a complete factual description of such plans, and identification of any written documents regarding such.

ANSWER:

- a. HVWWTP modifications/upgrades to include an anerobic chamber for denitrification enhancement purposes; expect to complete by May 2021.
- b. Currently, all that is known is continued general maintenance; and
- c. Currently, all that is known is continued general maintenance.

15. This interrogatory is in reference to your letter to the Chief Clerk of the NC Utilities Commission dated May 7, 2018, and attached to the Complaint as Exhibit K, which provides that the Harkers Village WWTP is a 6 ½ acre facility that "contains some of the highest in elevation land and best soils on the island for drain fields current and future." Please identify the available acreage for additional drain fields for future expansion of permitted capacity at Harkers Village WWTP.

ANSWER:

The existing 6 acres+- can be utilized as drain field and soil conditions are good for higher load rates. The HVWWTP is 25years old. New methods and technologies exist and are being used to process wastewater more thoroughly, and efficiently thus a higher load rate per SF is possible through design and the permitting process which could double HVWWTP's capacity for discharge onsite.

16. In connection with your response to the immediately preceding Interrogatory, please identify how much permitted capacity could be added by increasing drain fields.

ANSWER:

Based on informal conversations with a reputable soil scientist (NEED NAME HERE), doubling the permitted load rate is possible if new standards of discharge levels are met.

17. Please identify any and all complaints you have received regarding your wastewater treatment services in the two year period of time immediately preceding the date of this Interrogatory.

ANSWER:

The only complaints HISCO has received are several expressions of frustration in the current regulatory limits imposed on HISCO by DHHS regarding its ability to add new users without having to upgrade the current system.

18. Please identify any and all communications you have received regarding the regulatory performance or regulatory failures of your wastewater treatment plants.

ANSWER:

HVWWTP has in the past and currently often exceeds some specific discharge levels, (nitrites/nitrates). HISCO has applied and has now received a permit to add an anerobic chamber system upgrading the facility. This permit has been designed by the civil engineer Bill Forman and approved by NCDHHS review representative Steven Berkowicz which by virtue of approval agrees the upgrade should address the discharge limits exceedance. The work will commence immediately after receiving equipment and should be finalized by May of 2021. (See attachment "H")

19. Please identify the age and anticipated useful life of your wastewater treatment plants.

ANSWER:

The operator, engineer, inspecting state and county officials, and HISCO's manager all agree that this equipment is nearing the end of its useful life, but there is no specifically identifiable number of remaining years of "useful life" available to HISCO. HISCO anticipates continued, significant costs in terms of maintenance and repairs, especially to address corrosion. HISCO continues to explore various longer term options for replacement of current systems, including potential negotiations with the County, potential borrowing transactions, potential dealings with other existing and/or future developers, potential continued negotiations with Complainant and potential package plant purchases.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce any and all documents identified, requested to be identified, or used by you in any way in responding to any of the foregoing Interrogatories. Your response to this request should include electronic communications, emails, text messages and the like.

RESPONSE:

Subject to the above-stated General Objections, see attached.

2. Please produce any and all communications you have received from, or sent to, any local or state regulatory authorities (including DWR and DHHS) in the two-year period of time immediately preceding the date of this Request for Production. Your response to this request should include letters, electronic communications, emails, and the like regarding, or in any way relating to, regulatory failures of any of your facilities.

RESPONSE:

Subject to the above-stated General Objections, see attached.

3. Please produce any and all documents or communications that you, your agents or your representatives have had with engineers or experts, including without limitation Bill Foreman, regarding or in any way relating to the above-captioned proceeding. Your response to this request should include electronic communications, emails, text messages and the like.

RESPONSE:

See above-stated General Objections; HISCO and its counsel consider this request unduly broad and burdensome. HISCO is working on compiling various non-confidential emails and text messages covering the past three years and will provide same within the next ten days.

4. Please produce any and all documents or communications in your possession, custody or control regarding or in any way relating to your plans or ability to expand capacity for future users.

RESPONSE:

Subject to the above-stated General Objections, see all other produced documents; see all public records held by DWR, DHHS, the NCUC and the County. Informal conversations and reviews with soil scientist and civil engineer have occurred to acquire additional knowledge re system capabilities and potential future service to significant new users. Per all prior significant new user situations, any developer of the JC properties will have the responsibility of shouldering all up front costs related to formal studies and or designs needed to serve James Creek. As always, HISCO stands ready to assist by providing all available non-confidential information.

5. Please produce any and all documents or communications in your custody or possession regarding HISCO's plans to expand permitted capacity, including without limitation the costs associated with expanding permitted capacity. Your response to this request should include electronic communications, emails, text messages and the like.

RESPONSE: Subject to the above-stated General Objections, see all produced documents and information provided above.

6. Please produce any and all applications you have submitted to lenders in connection with your current performance bond.

RESPONSE:

None known. The NCUC called the prior \$100,000 bond and now holds those funds. With regard to the other \$30,000 currently required by the NCUC, it is in the form of a bond where HISCO anticipates continued annual renewals, including the most recent renewal which occurred very recently. A copy of this bond and the renewal invoice will be provided within the week.

This the 19th day of February, 2021.

s/Clark Wright

I. CLARK WRIGHT, JR.
N.C.BAR No. 11163
For the Firm of
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Telephone: (252) 514-2828
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Attorneys for Respondent HISCO

CERTIFICATE OF SERVICE

I certify that on the 19th day of February 2021, I served a copy of the foregoing RESPONDANT HARKERS ISLAND SEWER COMPANY RESPONSES TO COMPLAINANT'S FIRST SET OF INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS, AND REQUESTS FOR ADMISSIONS upon the following party by electronic transmission (email) and by depositing a true and correct copy thereof in an envelope bearing sufficient postage in the United States mail, in New Bern, North Carolina, addressed as follows:

Andrew D. Irby, Esq.
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s/Clark Wright

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