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time, the Village was satisfied with SharpVue’s response, but reserved “the right to pursue additional discovery concerning these matters should it become necessary.”<sup>1</sup> *See* Reply at 6.

After the Village filed its Reply, the Commission held a hearing in Docket No. A-41, Sub 21, during which SharpVue’s managing partner, Lee Roberts, gave testimony. When asked about SharpVue’s interest in purchasing the ferry assets, Mr. Roberts emphasized the SharpVue is “a local firm,” and that SharpVue’s investors “are almost entirely North Carolina based.” *See* Exhibit 2, No. A-41, Sub 21, Tr. Vol. 4 at 11:22-24. Because the investors are local, Mr. Roberts explained, “[t]hey all understand what Bald Head is.” *Id.* at 11:24-12:1. Mr. Roberts also explained that there are “a significant number of homeowners invested with us in this transaction.” *Id.* at 12:1-2. Mr. Roberts raised these points as evidence that SharpVue is “committed to the state . . . but also to the ecosystem in and around the Island.” *Id.* at 12:3-4. He contrasted SharpVue, the “local” investor, to the ferry’s current owner, which he called “third-party managers based in Texas,” explaining that SharpVue is “very integrated into the – the life of the island and the ecosystem there . . . more so than remote managers,” i.e., Limited. *Id.* at 12:13-17.

Since the Village filed its Reply, it has become clear that SharpVue intends to highlight its investors to demonstrate its ability and qualifications to purchase the ferry system. For example, Mr. Roberts claimed that his investors are more qualified than

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<sup>1</sup> The Village also sought information about Pelican Legacy Holding’s co-investors and the ownership percentages of BHI Ferry Transportation, LLC, Pelican Legacy Holdings, LLC, SVC Pelican Partners, LLC, and SharpVue Capital, LLC. The Village has always maintained that SharpVue’s responses to these requests are not adequate, even after SharpVue supplemented its responses, and that the Commission should compel the production of this information. *See* Reply 6-7.

Limited's, and have an intimate "understanding" of Bald Head. The Village is thus entitled to test this claim. Although SharpVue has provided the cities in which its investors are located, given that Mr. Roberts has more specifically invoked the investors' familiarity with and commitment to Bald Head, the Village must know the identity of these investors. The Village thus asks the Commission to compel SharpVue's full response to Request 2-24.

WHEREFORE, the Village respectfully requests that the Commission grant its Motion to Compel and order SharpVue to provide complete responses to Data Requests 2-24, as well as 2-11, 2-16, 2-19, 2-21, 2-25, and 2-27.

This 22<sup>nd</sup> day of November, 2022.

By: /s/ Marcus Trathen  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing AMENDED REPLY IN RESPONSE TO MOTION TO COMPEL has been served this day upon all parties of record in this proceeding, or their legal counsel, by electronic mail or by delivery to the United States Post Office, first-class postage pre-paid.

This the 22<sup>nd</sup> day of November, 2022.

By: /s/ Marcus Trathen