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September 7, 2022

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street, Room 5063
Raleigh, NC 27603

Via Electronic Submittal

**Re: In the Matter of
WLI Investments, LLC, Complainant, v. Old North State
Water Company, Inc. and Pluris Hampstead, LLC, Respondents
Docket Nos. W-1300, Sub 77 and W-1305, Sub 35
Respondents' Request for Extension of Time**

Dear Ms. Dunston:

On behalf of Old North State Water Company (ONSWC) and Pluris Hampstead, LLC (Pluris), together (Respondents), we herewith submit Respondents' Request for Extension of Time in the above referenced matter and dockets.

If you should have any questions concerning this filing, please let me know.

Thank you and your staff for your assistance.

Sincerely,
/s/ David T. Drooz
David T. Drooz
Attorney for
Old North State Water Company, Inc.

pbb
Enclosure

cc: All parties and counsel of record
NC Public Staff

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Sep 07 2022

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-1305, Sub 35
DOCKET NO. W-1300, Sub 77

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
WLI Investments, LLC, 60 Gregory)	
Road, Suite 1, Belville, NC 28451,)	
Complainant,)	
)	
v.)	
)	
Old North State Water Company, Inc.)	
and Pluris Hampstead, LLC,)	
Respondents.)	
)	RESPONDENTS' REQUEST FOR EXTENSION OF TIME

NOW COME Old North State Water Company, Inc. (ONSWC) and Pluris Hampstead, LLC (Pluris)(together, Respondents), and move for an extension of time with respect to one part of the North Carolina Utilities Commission's (Commission) September 2, 2022, Order on WLI Investments, LLC's Motion to Compel (Order). In support of this Request, Respondents show as follows:

1. The Order provides that Respondents are to "serve WLI with copies of the documents requested in WLI's DRQ Nos. 2, 3, and 8" by September 9, 2022. All three of these request items apply to Pluris; only items 2 and 3 apply to ONSWC.
2. The Order was received on the eve of the Labor Day weekend, effectively providing Respondents with four working days to provide the requested documents.

3. Neither the Order nor the definition of “document” in the WLI data request number 1 expressly refer to “email” or “electronic mail.” Assuming the intent of WLI data request number 1 and the Commission’s Order was to include electronic mail as part of the discovery covered by items 2 and 3, Respondents do not believe it is feasible for them to respond by the September 9, 2022, deadline.

4. In particular, ONSWC and Pluris each estimate there are likely to be hundreds of emails that refer to the terms in items 2 and 3 of the WLI data request. Not only will searching and downloading the numerous emails with those terms be time-consuming, but then Respondents will need to review every one of them to determine which ones require labeling as “confidential” on the basis of trade secrets. Then a further review will have to be conducted by legal counsel for every responsive email to determine if attorney-client privilege, common interest or attorney work product protections need to be asserted. Then a privilege log will have to be created. ONSWC and Pluris doubt this time-consuming process can be completed as to all responsive emails by the September 9, 2022, deadline. Consequently, Respondents move for an extension of time to September 15, 2022, in which to provide whatever non-privileged email records are responsive to items 2 and 3 in WLI data request number 1.

5. WLI has stated that it consents to September 15, 2022, extension of time to for ONSWC and Pluris to produce email records responsive to WLI data request 1, items 2 and 3.

THEREFORE, Respondents respectfully request that the Commission grant ONSWC and Pluris an extension of time until September 15 to provide such electronic mail records.

This the 7th day of September, 2022.

FOX ROTHSCHILD, LLP

/s/ David T. Drooz

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Attorneys for Pluris Hampstead, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Respondents' Request for Extension has been served on all parties and counsel of record in these dockets by either depositing same in a depository of the United States Postal Service, first-class postage prepaid and mailed by the means specified below, or by electronic delivery.

This the 7th day of September, 2022.

FOX ROTHSCHILD LLP

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