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broad and unduly burdensome. A copy of the WLI response to ONSWC DR 1 is attached as Exhibit 2.

3. ONSWC maintains the request in item 6 is reasonably calculated to lead to admissible evidence, and is not overly broad or burdensome. First, it could lead to evidence relating to WLI's willingness to use non-low pressure collection systems in the Lea Tract and in other areas of Pender County where it has been a developer. Second, by identifying non-low pressure systems designed by or on behalf of WLI, it could lead to evidence of use of gravity collection systems by WLI in areas comparable to the Lea Tract. Third, by limiting the request to engineering drawings or specifications, the request is not overly broad or unduly burdensome. Such files are typically in electronic format, and the request is much narrower than "all records" related to non-low pressure systems.
4. WLI also asserts in its objection that "Documents within the scope of this request are in the possession of third-parties and unavailable to WLI Investments without extensive and extraordinary efforts." However, the "third-parties" would most commonly be engineers hired by WLI to draft the engineering drawings or specifications. With WLI as their client, those engineers should be readily available to produce copies of such engineering drawings and specifications to WLI to the extent that copies are not already in the custody of WLI.

THEREFORE, ONSWC respectfully requests that the Commission order WLI to provide all records responsive to item 6 in ONSWC DR 1 within a reasonable amount of time.

This the 6th day of September, 2022.

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Company, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion to Compel 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 6th day of September, 2022.

FOX ROTHSCHILD LLP

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