



4. DWR has indicated that many of the communications with the Chief Engineer were work product or attorney/client privileged communications because they were made in anticipation of litigation.
5. The District is asking that all of these communications be unredacted.
6. The District is further asking for DWR to enumerate all ex parte communications DWR or the City has had with the Chief Engineer regarding the subject matter of this hearing.

WHEREFORE, the District respectfully prays for the Chief Engineer to enter an order compelling the DWR to unredact all communications regarding the ASR Proposal that involve the Chief Engineer, for payment of the District's attorney fees in preparing and arguing this Motion, and such other and further relief as the Chief Engineer deems just and equitable.

RESPECTFULLY SUBMITTED,



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**CERTIFICATE OF FILING AND SERVICE**

We, Thomas A. Adrian and David J. Stucky, do hereby certify that a true and correct copy of the above was served by ( ) mail, postage prepaid and properly addressed by depositing the same in the U.S. mail; ( ) fax; (x) email; and/or ( ) hand delivery on the 11th day of March, 2019, to:

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