

Applicant's interrogatories be destroyed (meaning physically obliterated, discarded or rendered unavailable for any other reason).13/

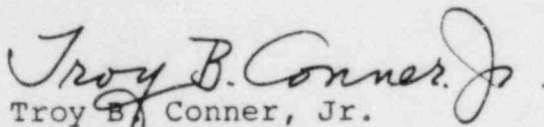
Additionally, the Board should require LEA's representative to explain the reasons and circumstances surrounding the destruction of discoverable documents.

Conclusion

For the reasons discussed more fully above, the Licensing Board should grant Applicant's motion to compel by requiring LEA: (a) to answer interrogatories for which no answer has been given; (b) provide more complete or specific answers as appropriate; (c) supplement existing answers with updated information no later than August 31, 1984; (d) produce previously withheld documents forthwith; and (e) implement appropriate measures to restore the status quo as to destroyed documents to the fullest extent possible.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.


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August 2, 1984

13/ This request for relief was made known to LEA in Applicant's letter dated August 1, 1984 at pages 7 and 8.