



**New Jersey Division of Rate Counsel**

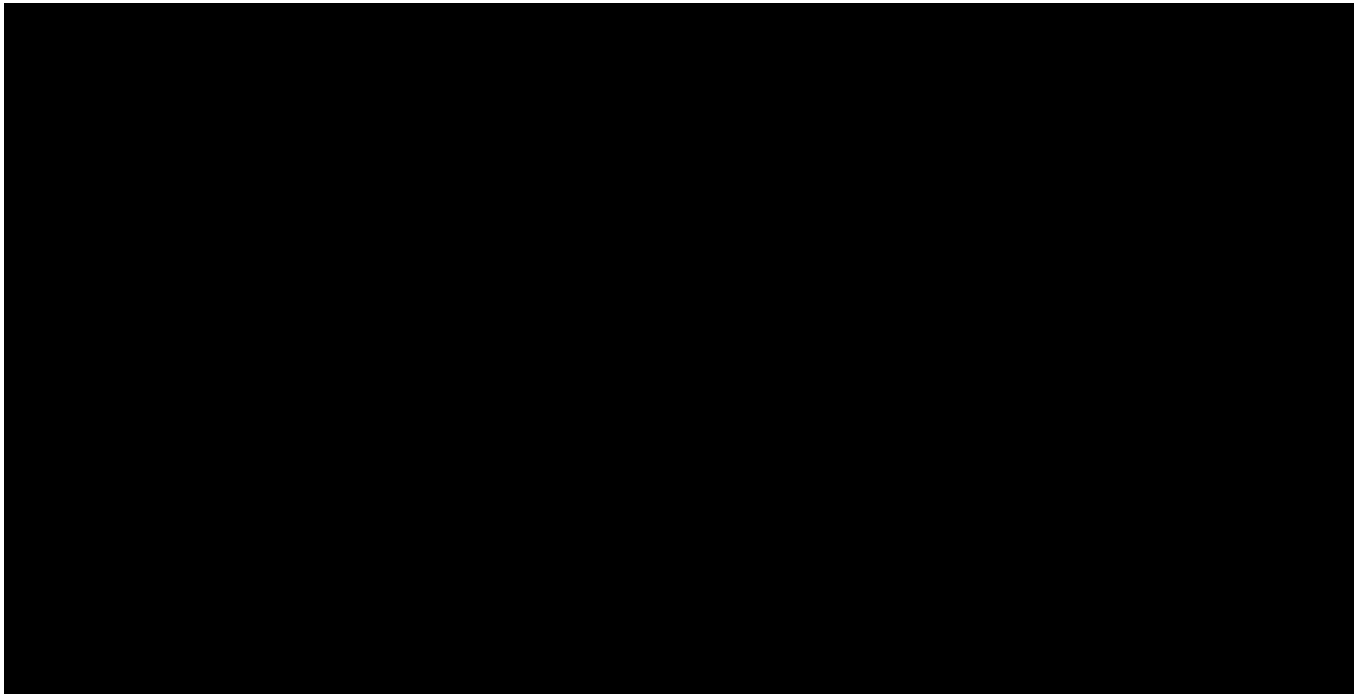
140 East Front Street, 4<sup>th</sup> floor

P.O. Box 003

TRENTON, NJ 08625

*By e-mail*

***To Henry Ogden, New Jersey Division of Rate Counsel:***



Sincerely,

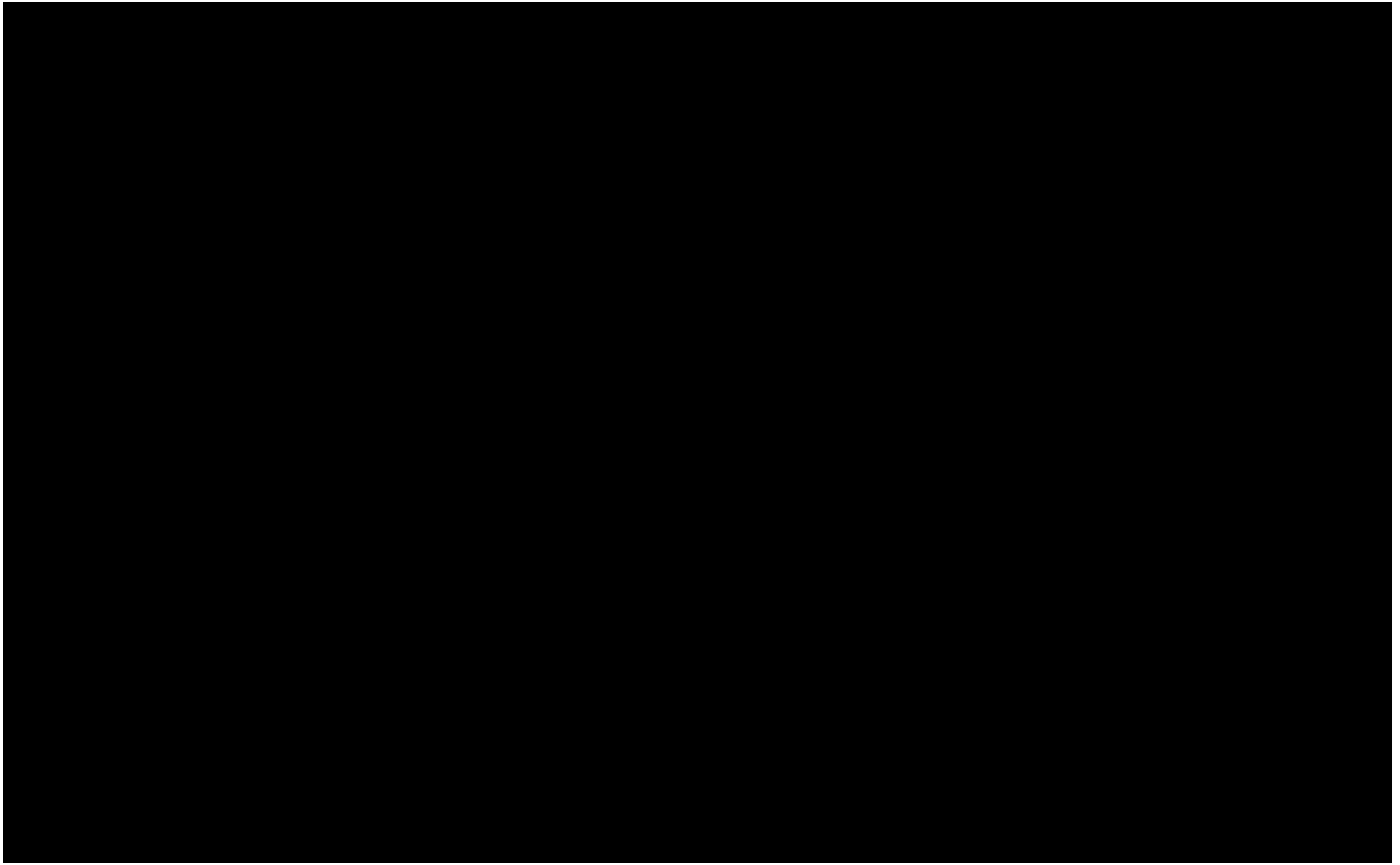
Joris Veldhoven,  
Commercial and Finance  
Director

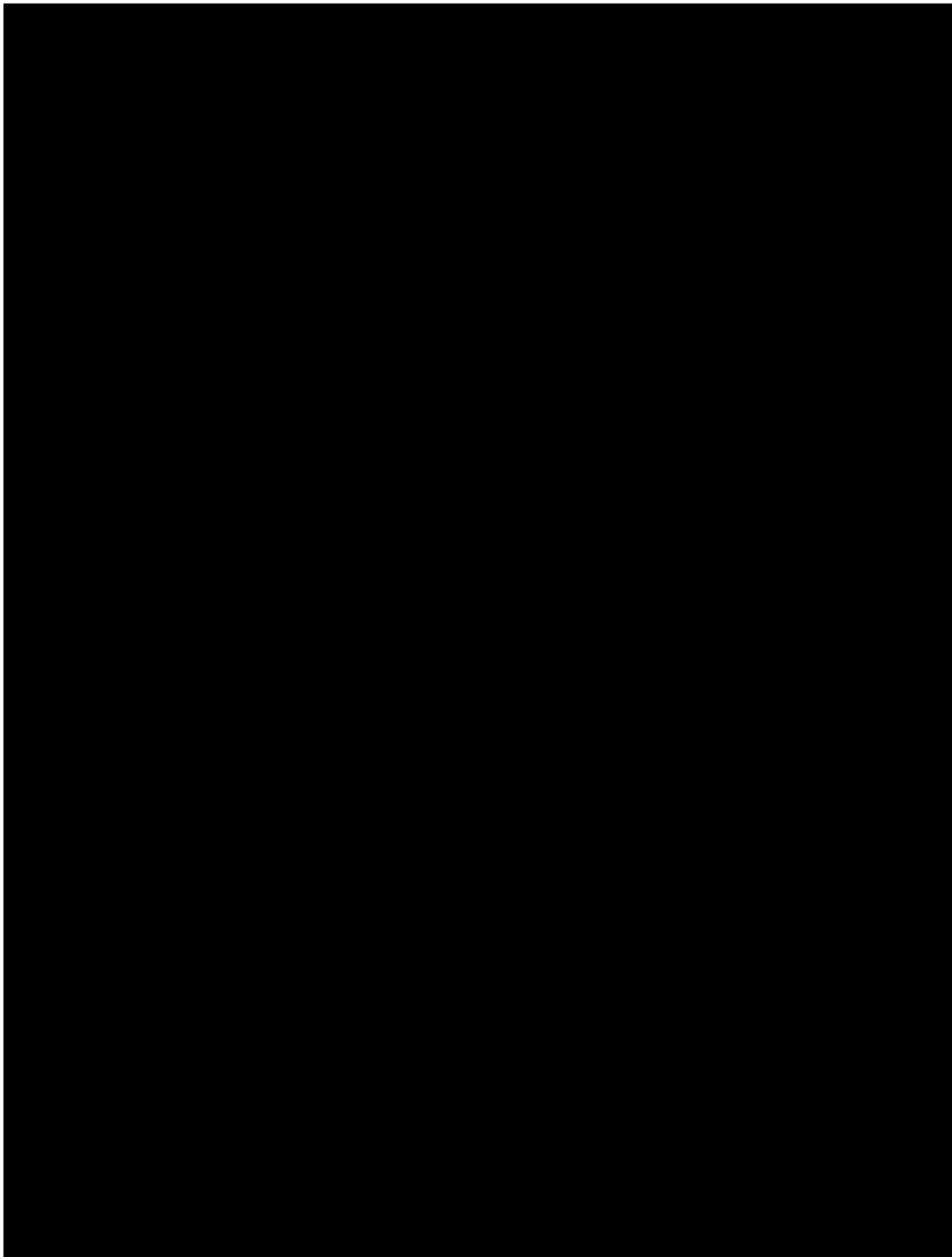
Nathalie Jouanneau,  
Bid Manager

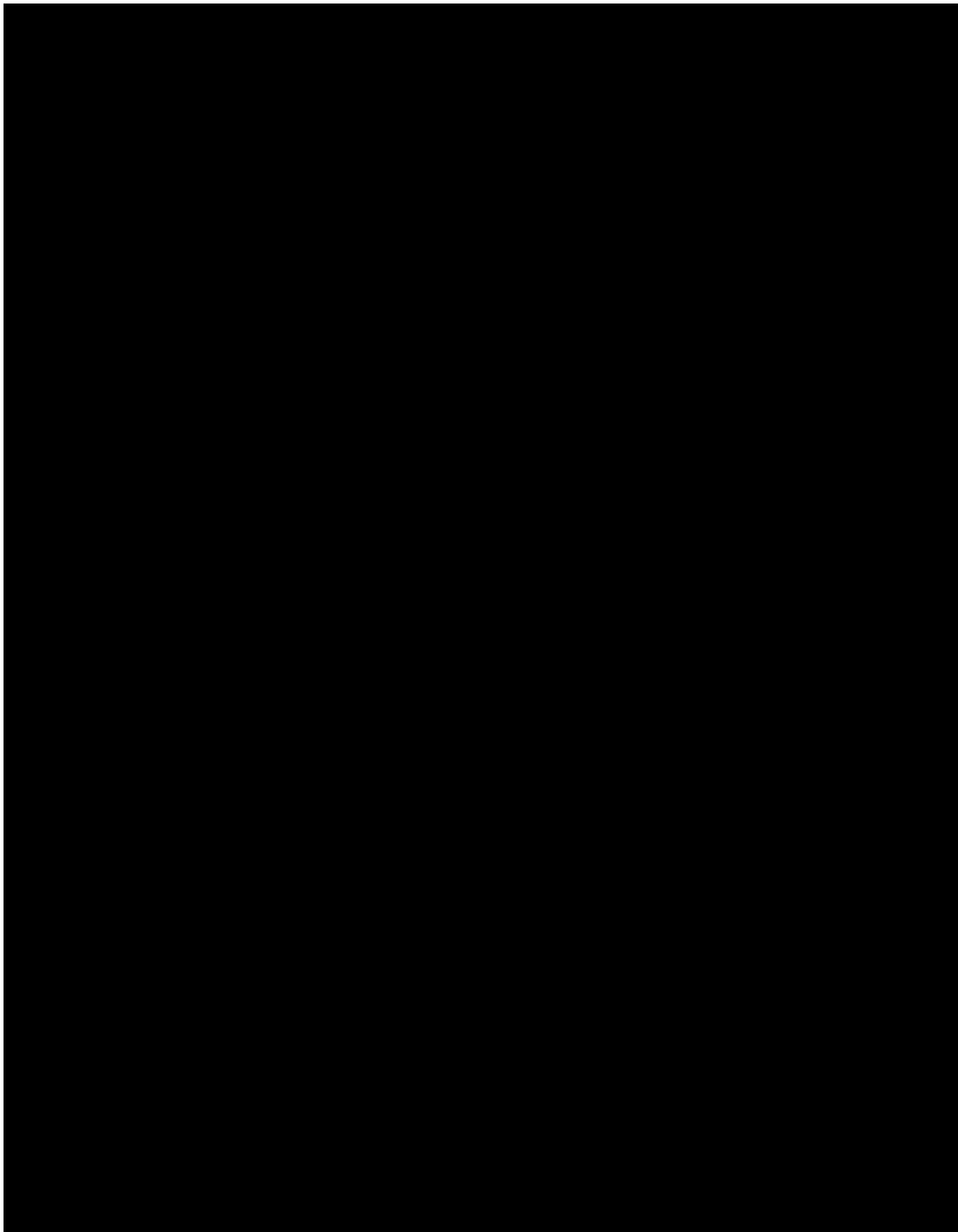
DocuSigned by:  
*Joris Veldhoven*  
AA432ABFC471498...  
2/18/2021

DocuSigned by:  
*Nathalie Jouanneau*  
8AD948825B994D6...  
2/18/2021

**REQUESTS**







### **NON-WAIVER AND NON-ADMISSION**

If Atlantic Shores, in response to any Request, inadvertently produces documents-information that are or may be the subject of any of the stated objections or within the scope of the attorney-client and/or work product privileges, such production-information is not intended to be, nor shall it be deemed to be, a waiver of objections or protections with respect to such documents-information or any withheld documents-information. Atlantic Shores reserves its right to demand the return of all copies of such documents-information and to designate documents-information confidential. Nothing set forth herein, attached hereto, or included herewith shall be deemed an admission, either directly or adoptive, by Atlantic Shores.

### **GENERAL RESPONSES**

Atlantic Shores' production of documents and information regarding this matter is continuing. The answers herein are based on a reasonable investigation of such information and documents as are presently available to them and their agents. Atlantic Shores anticipates that further investigation and analysis may supply additional facts and additional meaning to known facts. Atlantic Shores reserves the right to modify, supplement and/or amend, as appropriate and/or as required, any and all responses herein as additional facts are ascertained, as additional documents are discovered or obtained and as additional analysis and contentions are formulated.

Atlantic Shores also reserves the right to object to the admission into evidence of any and all of the information made available in response to each Request herein on any grounds including, but not limited to, the grounds that they or any of them are irrelevant and immaterial to the issues in this matter. Atlantic Shores further specifies that their answers are based upon the present state of pre-hearing preparation and that some answers may be based upon information and belief and prepared with the advice and assistance of counsel.

### **GENERAL OBJECTIONS**

The following general objections apply and are incorporated into each response and specific objections detailed below, whether or not expressly incorporated by reference in such individual response.

1. Atlantic Shores objects to these Requests to the extent they purport to require the identification or production of information or documents protected from discovery by any privilege, including, the attorney-client privilege or work product doctrine and, more particularly, seek to probe the mental impressions, opinions, thought processes and/or strategies underlying Atlantic Shores' defenses in this litigation.
2. Atlantic Shores objects to these Requests to the extent that they purport to call for legal conclusions or request opinions or contentions that relate to the application of law to facts.

3. Atlantic Shores objects to these Requests to the extent that they are vague, unclear, premature, overly broad, harassing, unduly burdensome and oppressive, and seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
4. Atlantic Shores objects to these Requests to the extent they seek information that is proprietary, confidential, and/or contains trade secrets.
5. Atlantic Shores objects to these Requests to the extent that they seek information or documents that are the subject of privacy interests guaranteed by United States, New Jersey or other applicable law.
6. Atlantic Shores objects to these Requests to the extent they require the production or identification of documents, writings, records or publications available in the public domain or because such information is equally available to the parties.
7. Atlantic Shores objects to these Requests to the extent they seek information concerning any activities, policies, practices, procedures, or information within the possession or control of any person or entity other than Atlantic Shores because those persons or entities are best able to provide answers concerning its knowledge, operations and activities. Answers will be provided on behalf of Atlantic Shores only and will be based upon information known or reasonably available to it.
8. Atlantic Shores objects to these Requests to the extent they seek information no longer in existence or not currently in the possession, custody or control of Atlantic Shores on the grounds that such Requests would seek to require more of Atlantic Shores than any obligation imposed by law, would subject Atlantic Shores to unreasonable and undue annoyance, oppression, burden and expense, and would seek to impose on Atlantic Shores an obligation to investigate or discover information or material from third parties or sources who are equally accessible to the propounding party.
9. Atlantic Shores objects to these Requests to the extent they purport to impose obligations or responsibilities different from or in addition to those set forth in the applicable Rules of Court.
10. Each response is subject to all objections as to relevance and materiality (or any other objection) that would require the exclusion of any statement herein, if such statement were to be made by a witness present and testifying in Court.
11. A response to any Request is not intended and should not be construed to be a waiver by Atlantic Shores of all or any part of any objection to any Request.
12. These responses may contain all or part of these General Objections. The use of all or any part of these General Objections in such manner does not constitute, nor is it intended to constitute, a waiver of any of Atlantic Shores' rights herein.
13. Atlantic Shores reserves its right to amend or supplement these responses.