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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF COOS

ROB TAYLOR,)	Case No.: 19CV28149
Plaintiff,)	
v.)	DEFENDANT’S RESPONSE TO
)	PLAINTIFF’S FIRST REQUEST FOR
)	PRODUCTION OF DOCUMENTS
CITY OF BANDON, an Oregon Municipal)	
Corporation,)	
Defendant.)	
)	

Defendant, CITY OF BANDON, responds to Plaintiff’s First Request for Production of Documents as follows:

GENERAL OBJECTION

In addition to the particular objections specified in response to the individual production requests, Defendant makes the following general objections:

1. Defendant objects to production requests to the extent they call for information that is in the hands of Plaintiff or third parties with respect to whom Plaintiff has no control and/or has not yet completed discovery. Defendant reserves the right to supplement its responses as further information becomes available.
2. Defendant objects to production requests to the extent they require production beyond that which is necessary under applicable civil rules.
3. To the extent Defendant responds to any of the production requests that may be subject to one or more general or specific objections, Defendant’s response does not constitute

1 a waiver of Defendant's objections stated herein. Any and all responses provided by
2 Defendant are subject to these general objections and any additional specific objections
3 asserted.

4 **RESPONSE**

5 **Request No. 1:**

6 Any and all documents and information, including but not limited to, written
7 communications, emails, including all inner-office emails, notes, minutes,
8 correspondence, and/or reports, other than those subject to an attorney-client privilege,
9 related to Resolution No. 1908, Amending the Water Rate Schedule.

10 **Response No. 1:** Provided to the extent they are applicable to the request.


11 **Request No. 2:**

12 Any and all documents and information, including but not limited to, written
13 communications, emails, all inner-office emails, notes, minutes, correspondence, and/or
14 reports, other than those subject to an attorney-client privilege, related to the enactment
15 of Resolution 1909, Amending the Wastewater Rate Schedule.

16 **Response No. 2:** Provided to the extent they are applicable to the request.

17 Dated this 24th day of September, 2019.

18 CARLETON LAW OFFICE

19 
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