[illegible] RAL TRADE CO[illegible]

[illegible] E FEDERAL T[illegible]

[illegible] ISTRATIVE LAW JUDGES

[illegible] Respondent.

)

)

[illegible] UM IN SUPPORT OF [illegible]

[illegible] Discovery. The Motion is necessary because Respondent State Bo[illegible] attorneys [illegible]

[illegible] arding Complaint Counsel's ins[illegible] Respondent [illegible]

sts for Admissions ("Requests for Admission"), First Set of [illegible] t of Reque[illegible]

rrogat[illegible]"), and Fi[illegible] Interrogatories ("Int[illegible]

[illegible] tion") (collectively, the "Discovery Requests") [illegible] Docum[illegible]

o provide respon[illegible] s to numer[illegible] aint Counsel has refused [illegible]

[illegible] Requests, and has made several overbroad and inapplicable [illegible] the St[illegible]

[illegible] se requests [illegible] privilege claim[illegible]

ARGUMENT

not protect a document which is merely peripheral to actual policy formation." *Ethyl Corp. v. EPA*, 25 F.3d 1241, 1248 (4th Cir. 1994). Complaint Counsel have not been

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2011, I electronically filed the foregoing with

[redacted]