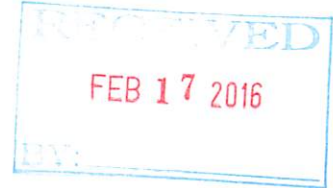


IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

ALASKA BUILDING, INC., an Alaska )  
corporation, )  
 )  
Plaintiffs, )  
 )  
vs. )  
 )  
716 WEST FOURTH AVENUE LLC and )  
LEGISLATIVE AFFAIRS AGENCY, )  
 )  
Defendants. )  
 )



Case No.: 3AN-15-05969 Civil

**RESPONSE TO ALASKA BUILDING, INC.'S REQUEST  
FOR IN CAMERA REVIEW**

As noted in the Court's Order Regarding ABI'S Motion to Compel, Defendant 716 West Fourth Avenue, LLC ("716") previously offered to provide its operating agreement to the Court for *in camera* review. Without waiving its relevance and confidentiality objections, 716 intends to follow through on this offer and provide the operating agreement to the Court if ordered to do so.

716 notes that in its Request for In Camera Review, ABI asserted new grounds for relevance. As these grounds were not raised in its Motion to Compel, and as they moreover seem inapplicable to a mundane business document such as the operating agreement, 716 respectfully requests that the Court disregard them.

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If the Court ultimately determines the operating agreement should be produced to ABI, 716 further requests that the production be subject to a protective order. 716's operating agreement is confidential and proprietary, and having it publicly disseminated by ABI would be detrimental to its business practices.

ASHBURN & MASON, P.C.  
Attorneys for 716 West Fourth Avenue, LLC

DATED: 2-16-16

By: JWR  
Jeffrey W. Robinson  
Alaska Bar No. 0805038

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RESPONSE TO REQUEST FOR IN CAMERA REVIEW  
*Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al.* 3AN-15-05969CI

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served  electronically  messenger  facsimile  U.S. Mail on the 16 day of February 2016, on:

James B. Gottstein  
Law Offices of James B. Gottstein  
406 G Street, Suite 206  
Anchorage, Alaska 99501

Kevin Cuddy  
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510 L Street, Suite 500  
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ASHBURN & MASON

By: Heidi Wyckoff  
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RESPONSE TO REQUEST FOR IN CAMERA REVIEW  
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 )  
Defendants. )  
 )  
 )  
 )

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Case No.: 3AN-15-05969 Civil

**[PROPOSED] ORDER ON ALASKA BUILDING, INC.'S REQUEST FOR IN  
CAMERA REVIEW**

This Court, having reviewed Alaska Building, Inc.'s ("ABI") Request for In Camera Review and 716 West Fourth Avenue LLC's ("716") response thereto, orders the following:

1. Within seven (7) days of the date of this Order, 716 shall provide its operating agreement, including material amendments, to the Court for in camera review.
2. If the Court determines that the operating agreement should be produced to ABI, it will allow 716 an opportunity to seek a protective order in advance of the production.

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DATED this \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
HON. PATRICK J. MCKAY  
Superior Court Judge

[PROPOSED] ORDER RE RESPONSE TO ALASKA BUILDING, INC'S REQUEST FOR IN  
CAMERA REVIEW  
*Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al.* 3AN-15-05969

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[PROPOSED] ORDER RE RESPONSE TO ALASKA BUILDING, INC'S REQUEST FOR IN  
CAMERA REVIEW

*Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al.* 3AN-15-05969