

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

ALASKA BUILDING, INC., an Alaska
corporation,

Plaintiff

vs.

716 WEST FOURTH AVENUE LLC,
KOONCE PFEFFER BETTIS, INC., d/b/a
KPB ARCHITECTS, PFEFFER
DEVELOPMENT, LLC, LEGISLATIVE
AFFAIRS AGENCY, and CRITERION
GENERAL, INC.,

Defendants.

Case No. 3AN-15-05969CI

**ALASKA BUILDING, INC.'S INTERROGATORY NUMBER 4 TO
CRITERION GENERAL, INC.**

Pursuant to Civil Rules 26(d)(1) and 33, Plaintiff Alaska Building, Inc. (Alaska Building), requests Defendant Criterion General, Inc. (Criterion), to answer the following interrogatory.

In responding to the request to "identify" workers please provide the following with regard to each such person:

- (1) The name of the person;
- (2) The business address of the person;
- (3) The residence address of the person;
- (4) The business telephone number of the person;
- (5) The residence telephone number of the person;
- (6) The e-mail address of the person;
- (7) The occupation of the person and the name of the employer of the person, if any.

LAW OFFICES OF
JAMES B. GOTTSTEIN
406 G STREET, SUITE 206
ANCHORAGE, ALASKA
99501

TELEPHONE
(907) 274-7686
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(907) 274-9493

II. CLAIMS OF PRIVILEGE:

If any response is withheld on grounds of privilege, the basis for such claim shall be stated with particularity.

INTERROGATORY NO. 4.

With respect to certain photographs supplied as part of the Initial Disclosures of Defendant Pfeffer Development Company, copies of which are attached hereto, please identify the four workers in the February 20, 2014, photograph, document number 200212; the five workers in the February 21, 2014, photograph, document number 200218; the two workers in the February 21, 2014, photograph, document number 200221; and the two workers in the February 21, 2014, photograph, document number 200222.

RESPONSE

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*Opposition to 716 LLC
Rule 56(f) Request*

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DATED: July 2, 2015.

Law Offices of James B. Gottstein

By: 
James B. Gottstein, ABA # 7811100

VERIFICATION OF RESPONSES

I swear or affirm that I have read the responses to Alaska Building, Inc.'s Interrogatory Number 4 to Criterion General, Inc., an Alaska corporation, and that they are true and correct to the best of my informed knowledge and belief.

Date: _____

STATE OF ALASKA)
) ss:
THIRD JUDICIAL DISTRICT)

Subscribed and sworn or affirmed to before me this ____ day of _____
201____, by _____.

Clerk of Court, Notary Public or
other person authorized to administer
oaths.

My Commission expires: _____

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date he mailed a copy hereof to:

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Eva R. Gardner
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Dated July 2, 2015.



Jim Gottstein





02.21.2014 09:05



02.21.2014 09:08

