

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/ba/  
KPB ARCHITECTS, PFEFFER  
DEVELOPMENT, LLC, LEGISLATIVE  
AFFAIRS AGENCY, and CRITERION  
GENERAL, INC.,

Defendants.

Case No. 3AN-15-05969CI

**ALASKA BUILDING, INC.'S FIRT SET OF INTERROGATORIES TO  
LEGISLATIVE AFFAIRS AGENCY**

Pursuant to Civil Rules 26(d)(1) and 33, Plaintiff Alaska Building, Inc. (Alaska Building), requests Defendant Legislative Affairs Agency (LAA) to answer the following interrogatories.

**I. DEFINITIONS**

Unless the question conclusively indicates otherwise, the following definitions apply to the words used in these interrogatories:

A. Person: The term "person" includes a corporation, limited liability company, partnership, other business association or entity, a natural person, and any government or government body, commission, board or agency.

B. Document: The term "document" is defined to mean and include any and all graphic or physical representations, including without limitation all handwritten, typed or printed material, photographs, copies of all the foregoing, and material stored on tape. computer or any other electronic medium, including e-mail, video and sound recordings.

C. Identification of Documents: When you are requested to "identify" a document, you are requested to provide the following with regard to each document:

- (1) A description of the document with sufficient particularity to enable the custodian of the document to respond to a request for production or subpoena *duces tecum* for the document;
- (2) The name, business address, residence address, telephone number and occupation of the present custodian of the document;
- (3) The date on which such document was first prepared; and
- (4) The name, business address, residence address, telephone number and occupation of each person who prepared or signed the document.

D. Identification of Natural Person: When you are requested to "identify" a natural person. you are requested to 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.

E. Identification of Business Entity: When you are requested to "identify" any corporation, partnership, limited liability company, joint venture or other business entity, you are requested to provide the following with regard to each such entity:

- (1) Whether the entity is a corporation, partnership, limited liability company, joint venture or other type of entity;
- (2) If the entity is a partnership or joint venture:
  - (i) identify each partner or joint venturer;
  - (ii) state whether he or she is a limited or general partner; and
  - (iii) specify the date on which the partnership or joint venture was formed;
- (3) If the entity is a corporation:
  - (i) identify each of the current officers of the corporation;
  - (ii) state the date of incorporation;
  - (iii) state the State in which the corporation is incorporated.
- (4) If the entity is a limited liability company:
  - (i) identify each of the current members and managers of the limited liability company;
  - (ii) state the date of formation;
  - (iii) state the State in which the limited liability company was formed.

F. You: The words "you" or "your" " refer to Defendant Legislative Affairs Agency, an Alaska state agency, and its (1) employees, (2) managers, (3) supervisors and overseers, including legislators, (4) attorneys, (5) agents when acting for it, and (5) any organization associated with it.

G. LIO Lease: The words "LIO Lease" refers to anything and everything related to that certain "Extension of Lease and Lease Amendment No. 3 Extension of Lease Under AS 36.30.083; Amendment of Lease; Material Modification of Lease," dated September 19, 2013, made and entered into by and between 716 LLC and defendant Legislative Affairs Agency (LAA), amending the Lease dated April 6, 2004, recorded in Book 2004-024411-0, Anchorage Recording District, Third Judicial District, State of Alaska, as previously amended, and renewed through May 31, 2014, by Renewal of Lease No. 5, recorded May 23, 2013, in Book 2013-028824-0, Anchorage Recording District, Third Judicial District, State of Alaska.

H. Relate: The words "relate" or "relating to" mean referring to, concerning, alluding to, responding to, connected with, commenting on, in respect of, about, regarding, discussing, showing, describing, mentioning, reflecting, analyzing, constituting, evidencing, or pertaining to, directly or indirectly, in whole or in part.

I. This Matter: For purposes of this Alaska Building's First Set of Interrogatories to Legislative Affairs Agency, the words "this matter" refers to:

- (a) Paragraphs 14-16, titled "Legislative Information Office Project," and
- (b) Paragraphs 17-22, Count III, titled "Count One—Illegality of LIO Project"

of the Complaint in this action, including without limiting the generality of the foregoing, anything related to the LIO Lease (i) extending a real property lease, and (ii) being at least 10 percent below the market rental value.

## 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. 1.

Please identify all persons with knowledge of the LIO Lease as it relates to this matter. If any such person(s) is an attorney, such person(s) must be identified.

### RESPONSE

INTERROGATORY NO. 2.

With respect to each person identified in response to the preceding interrogatory, please summarize such person's knowledge of the LIO Lease as it relates to this matter.

**RESPONSE**

**LAW OFFICES OF JAMES B. GOTTSTEIN**  
406 G STREET, SUITE 206  
ANCHORAGE, ALASKA 99501  
TELEPHONE (907) 274-7686  
FACSIMILE (907) 274-9493

INTERROGATORY NO. 3.

Please identify all documents relating to this matter.

**RESPONSE**

**LAW OFFICES OF JAMES B. GOTTSTEIN**  
406 G STREET, SUITE 206  
ANCHORAGE, ALASKA 99501  
TELEPHONE (907) 274-7686  
FACSIMILE (907) 274-9493

DATED: April 20, 2015.

Law Offices of James B. Gottstein

By: [Signature]  
James B. Gottstein, ABA # 7811100

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### VERIFICATION OF RESPONSES

I swear or affirm that I have read the responses to Alaska Building, Inc.'s First Set of Interrogatories to Defendant 716 West Fourth Avenue LLC 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: \_\_\_\_\_

**LAW OFFICES OF JAMES B. GOTTSSTEIN**  
406 G STREET, SUITE 206  
ANCHORAGE, ALASKA 99501  
TELEPHONE (907) 274-7686  
FACSIMILE (907) 274-9493



**CERTIFICATE OF SERVICE**

On this date, these Interrogatories were mailed to:

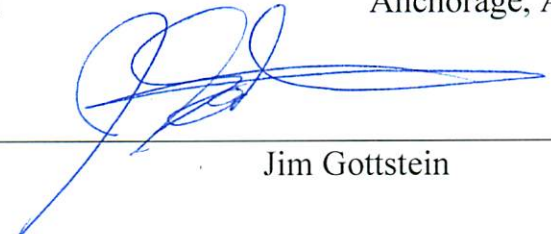
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Dated: April 20, 2015



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Jim Gottstein

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