## **Robinson+Cole**

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Also admitted in Massachusetts and New York

November 21, 2023

Via Electronic and U.S. Mail

Melanie A. Bachman, Esq. Executive Director/Staff Attorney Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Docket No. 517 – MCM Holdings, LLC Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility Located at The Boy Scouts of America Camp Hoyt, 288 Simpaug Turnpike (Parcel No. 12-29) Redding, Connecticut

Dear Attorney Bachman:

In accordance with the Siting Council's directive, enclosed please find the original and fifteen (15) copies of the Pre-hearing Submission of Cellco Partnership d/b/a Verizon Wireless ("Cellco"), an intervenor in this proceeding, identifying its witness panel and exhibits filed in advance of the November 30, 2023 evidentiary and public hearing sessions in Docket No. 517.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,

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Kenneth C. Baldwin

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Boston | Hartford | New York | Washington, DC | Providence | Miami | Stamford | Wilmington | Philadelphia | Los Angeles | Albany | rc.com

## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

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## PRE-HEARING SUBMISSION OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless ("Cellco"), an intervenor in this proceeding,

hereby provides the Connecticut Siting Council ("Council") with the following pre-hearing

information available at this time regarding the above-referenced Application.

- A. <u>List of Witnesses</u>
  - 1. Shiva Gadasu, Radio Frequency Engineer, Verizon Wireless
  - 2. Elizabeth Glidden, Real Estate/Regulatory Specialist, Verizon Wireless
- B. <u>Exhibits to be offered</u>

Cellco intends to offer the following Exhibits:

- Cellco's Responses to Pre-Hearing Interrogatories (Set 1) from the Council dated November 1, 2023.
- Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Dottie DeLuca dated November 20, 2023.

- Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Suzanne Fogle dated November 20, 2023.
- Cellco's Responses to Pre-Hearing Interrogatories from Intervenor JoAnn Villamizar dated November 20, 2023.
- Cellco's Responses to Pre-Hearing Interrogatories from Intervenor Dino Trevisani dated November 20, 2023.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and

administratively noticed materials as new and pertinent information and materials come to its

attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

0 M mig By:

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 Its Attorneys

## CERTIFICATE OF SERVICE

I hereby certify that on the 21<sup>st</sup> day of November 2023, a copy of the foregoing was sent,

via electronic mail, to:

Lucia Chiocchio, Esq. Daniel Patrick, Esq. Cuddy & Feder, LLP 445 Hamilton Avenue, 14<sup>th</sup> Floor White Plains, NY 10601 <u>lchiocchio@cuddyfeder.com</u> <u>dpatrick@cuddyfeder.com</u>

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Dino Trevisani Marchant Farm, LLC 12 Marchant Road Redding, CT 06896 <u>marchantfarm@gmail.com</u>

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Kenneth C. Baldwin