

From: [Baldwin, Kenneth](#)
To: [Bachman, Melanie](#); [Schaefer, Jon](#)
Cc: [Mayo, Rachel](#); [Brian Paul](#); ["elizabeth.glidden@verizonwireless.com"](mailto:elizabeth.glidden@verizonwireless.com); [CT4RT](#); [CSC-DL Siting Council](#)
Subject: RE: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental Response to Council's Interrogatory No. 54, Response to Interrogatories from Intervenor P. Nayden & Supplemental Pre-Hearing Submission
Date: Thursday, September 4, 2025 5:59:59 PM
Attachments: [image001.png](#)

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Attorney Bachman

This is in response to your email below and the two motions filed this afternoon by the Intervenor, Paska Nayden in Docket No. 535.

The Towers LLC does not object to the Intervenor's request for administrative relief and accommodation regarding the Council's acceptance of PDF documents in lieu of the "original" documents and the requirement for the hand-delivery fifteen (15) copies of said documents at 10 a.m. on the day of the continued evidentiary hearing.

The Towers LLC does however, object to the Intervenor's request to keep the evidentiary proceeding open for an additional 30-45 days to accept the applicant's responses to Intervenor's supplemental interrogatories. The Towers LLC filed those responses with the Council on Tuesday September 2, 2025, in accordance with the Council's detailed docket schedule. Electronic copies of those responses were also sent to the Intervenor.

The Towers LLC also objects to the Intervenor's request to screen share maps, figures and other electronic evidence. To the extent that these maps, figures and evidence are already a part of the Docket No. 535 record, there is no need to "screen share" that information. All parties will have access to that information during the hearing as it is already available in the Council's electronic data base. The deadline for the submission of new evidence has passed. The Towers LLC will object to any effort by the Intervenor introduce new evidence or exhibits at the September 9, 2025, evidentiary hearing.

Thank you for the opportunity to respond to these motions.

Kenneth C. Baldwin

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From: Bachman, Melanie <Melanie.Bachman@ct.gov>

Sent: Thursday, September 4, 2025 4:11 PM

To: Baldwin, Kenneth <KBALDWIN@RC.com>; Schaefer, Jon <JSchaefer@rc.com>

Cc: Mayo, Rachel <rmayo@RC.com>; Brian Paul <brian.paul@verticalbridge.com>;
'elizabeth.glidden@verizonwireless.com' <elizabeth.glidden@verizonwireless.com>; CT4RT
<ct4rt@protonmail.com>; CSC-DL Siting Council <Siting.Council@ct.gov>

Subject: RE: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental

CAUTION:

EXTERNAL EMAIL

Good afternoon, Attorneys Baldwin and Schaefer.

Please see the attached email with two motions from Intervenor Paska Nayden filed this afternoon with the Council related to the Council's regulatory requirement for an original and 15 copies of any document submitted into the record to be mailed or hand-delivered to the Council on or before the deadline in the schedule for this matter.

Please indicate whether or not you have an objection to the Motion for Administrative Relief, which seeks acceptance of the pdfs of the Intervenor's supplemental interrogatories and other documents filed in this matter by the Intervenor as the "original" and a waiver of the 15 copy requirement, or in the alternative, hand delivery of the 15 copies at 10 AM on the day of the continued evidentiary hearing session.

If you and your client have no objection to the Motion for Administrative Relief, the Alternative Motion filed by Ms. Nayden would be rendered moot.

Please advise at your earliest convenience.

Thanks.

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
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From: Arguello, Karina I. <KArguello@rc.com>

Sent: Tuesday, September 2, 2025 12:25 PM

To: Bachman, Melanie <Melanie.Bachman@ct.gov>; CSC-DL Siting Council <Siting.Council@ct.gov>

Cc: Baldwin, Kenneth <KBALDWIN@RC.com>; Schaefer, Jon <JSchaefer@rc.com>; Mayo, Rachel <rmayo@RC.com>; Brian Paul <brian.paul@verticalbridge.com>;

'elizabeth.glidden@verizonwireless.com' <elizabeth.glidden@verizonwireless.com>; CT4RT
<ct4rt@protonmail.com>

Subject: Docket No. 535 - 835 Norwich Turnpike (Route 169), Woodstock, CT - Supplemental Response to Council's Interrogatory No. 54, Response to Interrogatories from Intervenor P. Nayden & Supplemental Pre-Hearing Submission

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Good afternoon,

Please see the attached correspondences:

- Supplemental Response to Council's Interrogatory No. 54
- Responses to Interrogatories from Intervenor, P. Nayden
- Supplemental Pre-Hearing Submission

Hard copies will be hand delivered to the Council this afternoon.

Thank you,
Karina

Karina I. Arguello (she/her/hers)
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