



CITY OF  
**PORTLAND, OREGON**  
OFFICE OF CITY ATTORNEY

Linda Meng, City Attorney  
1221 S.W. 4th Avenue, Suite 430  
Portland, Oregon 97204  
Telephone: (503) 823-4047  
Fax No.: (503) 823-3089

August 23, 2006

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*Via Electronic Mail and U.S. Mail*

CHRISTINA SMITH  
ADMINISTRATIVE LAW JUDGE  
550 CAPITOL ST NE #215  
PO BOX 2148  
SALEM OR 97308-2148

Re: UM 1262 – In the Matter of the Complaint of the City of Portland Against  
Portland General Electric

Dear Judge Smith:

I am assisting Senior Deputy City Attorney, Benjamin Walters, with the discovery in the above-referenced matter. This morning PGE counsel, Barbara Halle, and I conferred regarding discovery. Ms. Halle and I ended our conversation agreeing that any ruling regarding discovery should be stayed until a ruling is made on PGE's Motion for Summary Judgment. Your ruling on the summary judgment motion will help my office determine how extensive our discovery request should be (or if necessary at all).

Therefore, as a matter of judicial economy and ease of process, I request that a determination be made on the summary judgment motion first and then to allow Ms. Halle and I to confer regarding discovery (if necessary).

Thank you for your time and consideration.

Sincerely yours,

Roland Iparraguirre  
Deputy City Attorney

RI:KT

c. Barbara W. Halle

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