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

ALASKA BUILDING, INC., an Alaska corporation,) RECEIVED JUN 4 2015
Plaintiff,)) BY;
V.)
716 WEST FOURTH AVENUE, LLC, KOONCE PFEFFER BETTIS, INC., d/b/a KPB ARCHITECTS, PFEFFER DEVELOPMENT, LLC, LEGISLATIVE AFFAIRS AGENCY, and CRITERION GENERAL, INC.,	Case No. 3AN-15-05969 CI))))
Defendants.	

KPB ARCHITECTS' RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

Defendant Koonce Pfeffer Bettis, Inc., d/b/a KPB Architects hereby responds to plaintiff's First Set of Interrogatories, dated April 20, 2015.

GENERAL OBJECTIONS

Defendant objects to responding to these interrogatories as overbroad and unduly burdensome. Defendant also objects to responding to these interrogatories to the extent that they require waiver of any attorney-client privileges.

INTERROGATORY NO. 1: Please identify all persons with knowledge of the LIO Project as it relates to this matter. If any such person(s) is an attorney, such person(s) must be identified.

RICHMOND & QUINI PROFESSIONAL CORPORATI 360 K STREET, SUITE 20 CHORAGE, ALASKA 99501-2 (907) 276-5727 FAX (907) 276-5253

> KPB Architects' Response to Plaintiff's First Interrogatories <u>Alaska Building, Inc. v. KPB Architects, et al.</u>, Case No. 3AN-15-05969 CI Page 1 of 4

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ANCHORAGE, ALASKA 28501(907) 276-2857
FAX (907) 276-2857

<u>RESPONSE</u>: Without waiving the above stated objections, <u>see</u> attached list of contractors and personnel.

<u>INTERROGATORY NO. 2</u>: With respect to each person identified in response to the preceding interrogatory, please summarize such person's knowledge of the LIO Project as it relates to this matter.

<u>RESPONSE</u>: Without waiving the above stated objections, <u>see</u> above.

<u>INTERROGATORY NO. 3</u>: Please identify all documents relating to this matter.

<u>RESPONSE</u>: Without waiving the above stated objections, <u>see</u> attached list of documents involving this project.

SIGNED AS TO OBJECTIONS ONLY,

DATED this day of June, 2015, at Anchorage, Alaska.

RICHMOND & QUINN Attorneys for Defendant Koonce Pfeffer Bettis, Inc. d/b/a KPB Architects

By:

Daniel T. Quinn

Alaska Bar No. 8211141

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by mail this day of June, 2015, on:

James B. Gottstein Law Offices of James B. Gottstein 406 G Street, Suite 206 Anchorage, AK 99501

Kevin M. Cuddy Stoel Rives LLP 510 L Street, Suite 500 Anchorage, AK 99501

Jeffrey W. Robinson Ashburn & Mason 1227 W. 9th Avenue, Suite 200 Anchorage, AK 99501 Cynthia L. Ducey Delaney Wiles, Inc. 1007 W. 3rd Avenue, Suite 400 Anchorage, AK 99501

Mark P. Scheer Scheer & Zehnder, LLP 701 Pike Street, Suite 2200 Seattle, WA 98101

RICHMOND & QUINN

520.002\DISC\KPB's Response to Plf's 1st ROGS

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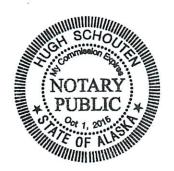
VERIFICATION

STATE OF ALASKA)
) ss
THIRD JUDICIAL DISTRICT)

I, Jeffrey Koonce, on behalf of Koonce, Pfeffer, Bettis, d/b/a KPB Architects, do hereby verify that I have read the foregoing answers to interrogatories and that they are true and correct to the best of my knowledge, based on the information available to me.

Jeffrey Koonce

SUBSCRIBED AND SWORN to before me this $\frac{2 \text{ nd}}{2 \text{ nd}}$ day of June, 2015.



Notary Public In and For Alaska

My Commission Expires: Od. 1, 2015

LAW OFFICES

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as professional corporation
as or street. Suite 200
ACHORAGE. ALASKA 99501-203
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EX (907) 274-28727

Legislative Information Office Contractors & Subcontractors

KPB ARCHITECTS

- Mike Prozeralik
- Jeff Koonce
- Andrew Weiss
- Alisha Weiss

CRITERION GENERAL

- Dave DeRoberts
- Kendall Wilson
- Barry Lapp

RIED MIDDLETON

- Ken Anderson
- Dave Stierwalt

EBSC ENGINEERING

- Luke Mattson
- Eddie Hakala

EDGE SURVEY AND DESIGN

• Tony Wilson

THE CHARIOT GROUP

• Dan Johnson

EIC ENGINEERS

- Eric Cowling
- Ezra Clark

RSA MECHANICAL ENGINEERS

• Tyler Gray

Legislative Information Office List of Documents

Administrative

- 1. Contracts
- 2. Fee Proposals
- 3. Correspondence / Meetings
- 4. Photographs
- 5. Construction Administration (CA); ASI's, Change orders, Consultants, Reports, RFI's and Submittals

<u>AutoC</u>AD

1. Base drawings, Furniture Graphics and Plumbing fixtures

Documents

- 1. Archive Documents; predesign, lease documents, footing and foundation permit submittal, permitting, conformed post permitting, as-builts and temp space
- 2. As-builts
- 3. Design analysis
- 4. LEED
- 5. LIO Garage As-builts
- 6. Presentations
- 7. Sketches
- 8. Specifications
- 9. Support documents

Escape plans

Interior design files

- 1. Criterion to purchase
- 2. FF&E bid package
- 3. Furniture budget
- 4. Lightings
- 5. Materials
- 6. Narrative
- 7. Plumbing
- 8. Presentation imagery sheets
- 9. Presentation sketches
- 10. Security desk
- 11. Signage

Permitting

- 1. Alternative means 1
- 2. Alternative means 2
- 3. Alternative means 3

Project fact sheet

Revit files (Revit Programs are required to review)

- 1. Revit
- 2. Attach
- 3. Library
- 4. Model
- 5. Render
- 6. Support
- o. Suppoi

Temp TI Folder

Transfer

Emails from staff