

2016 AUG 24 PM 1:01

DATE FILED: August 24, 2016  
CASE NUMBER: 2016CV144

<input type="checkbox"/> Small Claims <input type="checkbox"/> County Court <input checked="" type="checkbox"/> District Court <input type="checkbox"/> Probate Court <input type="checkbox"/> Juvenile Court <input type="checkbox"/> Water Court Larimer County, Colorado Larimer County Justice Center 201 La Porte Ave Suite 100 Ft. Collins, CO 80521	
Plaintiff: Virginia L. Farver v Defendant(s): City of Fort Collins Fort Collins City Council Darin Atteberry Fort Collins Utilities Fort Collins Utilities Management and Staff Dennis Sumner Steve Catanach; and Does 1 - 100	
Attorney or Party Without Attorney: (Name & Address) Virginia L. Farver 1214 Belleview Drive Fort Collins, CO 80526  Phone Number: 970-689-3798 FAX Number: E-mail: Atty. Reg. #:	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> Case Number: 2016 CV 144  Div.:                      Ctrm: Courtroom 5B
<b>Plaintiff's Supplemental Rule 26 a 1 disclosures on documents</b>	

Plaintiff makes the following supplemental disclosures pursuant to C.R.C.P. Rule 26(a)(1).

**Documents**

That section says:

(1) Disclosures. Except to the extent otherwise directed by the court, a party shall, without awaiting a discovery request, provide to other parties the following information, whether or not supportive of the disclosing party's claims or defenses:

(B) a listing, together with a copy of, or a description by category, of the subject matter and location of all documents, data compilations, and tangible things in the possession, custody or control of the party that are relevant to the

claims and defenses of any party, making available for inspection and copying such documents and other evidentiary material, not privileged or protected from disclosure, as though a request for production of those documents had been served pursuant to C.R.C.P. 34;

Plaintiff will make available for inspection and copying the following documents. These documents are located in Plaintiff's file and / or on Plaintiff's computer. The categories of documents include:

#1 all of those documents that Plaintiff delivered to the City as part of her "notice and claim of injuries and damages related to the Advanced Metering Fort Collins project" (or "notice and claim") dated September 23, 2015 and hand delivered and mailed by certified mail to the City on that date, a copy of which was served on Defendants as part of the Complaint, and;

#2 all of the documents that Plaintiff served on the defendants as part of the Complaint; and

#3 the emails between Plaintiff and the City or any of its agents related to the AMFC Project and Plaintiff's Open Records Act request for the resolution / ordinance etc. authorizing the Project.

#4 Plaintiff's correspondence with the City about the health impacts of wireless radiation

#5 Plaintiff's correspondence with the City about the City's intention to remove the analog meter from her house and install a smart meter on it and Plaintiff's desire to keep her analog meter and not be required to have a smart meter, and about the option to receive an alternative meter if Plaintiff were to pay a manual meter reading charge.

The above described documents are all "in the possession, custody or control of the party [Plaintiff] that are relevant to the claims and defenses of any party". They are also in the possession, custody or control of the City.

Dated August 24, 2016

Respectfully submitted,

  
Virginia L. Farver

CERTIFICATE OF SERVICE

The undersigned hereby signifies that a true and correct copy of the foregoing Plaintiff's C.R.C.P. 26(a)(1) supplemental disclosures was served via email on this date the \_\_\_\_\_ day of August, 2016 on the following.

Kimberly Schutt  
Wick and Trautwein, LLC  
P.O. Box 2166  
Fort Collins, Colorado 80522

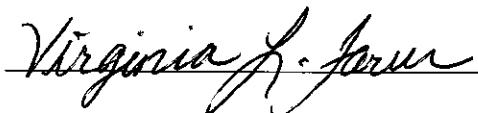
at her email address [kschutt@wicklaw.com](mailto:kschutt@wicklaw.com)

and

John R. Duval  
Fort Collins City Attorney's office  
P.O. Box 580  
Fort Collins, CO 80522

at his email address [jduval@fcgov.com](mailto:jduval@fcgov.com)

Respectfully submitted,

  
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Virginia L. Farver