

ANTHONY I. BLENKINSOP
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City of Dover, New Hampshire

OFFICE OF GENERAL LEGAL COUNSEL

October 28, 2015

VIA EMAIL & FIRST CLASS MAIL

Pamela Monroe, Administrator
NH Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301
pamela.monroe@sec.nh.gov

Re: Request of SEA-3, Inc. for Exemption from the
Approval and Certificate Provisions of RSA Chapter 162-H

Dear Ms. Monroe:

Please find enclosed the City of Dover's Notice of Joinder and the City of Dover's Objection to the Applicant's Motion for Protective Order regarding the above captioned matter that I wish to place on file at this time, with the New Hampshire Site Evaluation Committee.

Sincerely,

Anthony I. Blenkinsop
City Attorney
Enc.

Cc: Service list (via email)

**THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

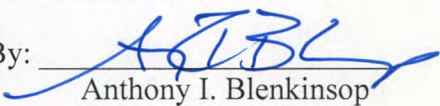
IN RE: SEA-3, INC.)	
)	
)	Docket No.: 2015-01
Request for Exemption)	
)	

**THE CITY OF DOVER’S NOTICE OF JOINDER IN COUNSEL FOR THE PUBLIC’S
MOTION TO COMPEL PRODUCTION OF DATA REQUEST RESPONSE, TO
POSTPONE HEARING, AND FOR ORDER TO SHOW CAUSE**

NOW COMES the City of Dover, by its counsel, and respectfully joins in the relief requested in Counsel for the Public’s Motion to Compel Production of Data Request Response, To Postpone Hearing, and For Order to Show Cause filed on October 20, 2015 (“Counsel for the Public’s Motion”) for the reasons described in Counsel for the Public’s Motion. The City of Dover formally joins in the prayers for relief in Paragraph 11, subparts A, B and C of Counsel for the Public’s Motion.

Respectfully submitted,
THE CITY OF DOVER
By its Attorney,

Date: October 28, 2015

By: 
Anthony I. Blenkinsop
City Attorney
NHBA No. 14173
288 Central Avenue
Dover, NH 03820
(603) 516-6520
a.blenkinsop@dover.nh.gov

Certification

I hereby certify that on this 28th day of October 2015, I caused a copy of the foregoing Notice of Joinder, to be sent via email to the persons on the Service List on this Docket.


Anthony I. Blenkinsop

THE STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

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IN RE: SEA-3, INC.)
)
Request for Exemption)

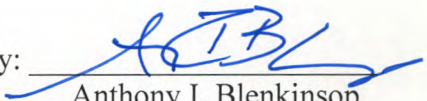
Docket No.: 2015-01

**THE CITY OF DOVER'S OBJECTION TO THE APPLICANT'S MOTION FOR
PROTECTIVE ORDER AND CITY'S NOTICE OF JOINDER IN PORTSMOUTH
INTERVENORS' OBJECTION TO THE APPLICANT'S MOTION FOR A PROTECTIVE
ORDER**

NOW COMES the City of Dover, by its counsel, and respectfully objects to Applicant's Motion for a Protective Order for the reasons described in the Portsmouth Intervenors' Objection to the Applicant's Motion for a Protective Order ("Dover Intervenors' Objection"). The City of Dover hereby formally joins in the Portsmouth Intervenors' Objection and relief requested.

Respectfully submitted,
THE CITY OF DOVER
By its Attorney,

Date: October 28, 2015

By: 
Anthony I. Blenkinsop
City Attorney
NHBA No. 14173
288 Central Avenue
Dover, NH 03820
(603) 516-6520
a.blenkinsop@dover.nh.gov

Certification

I hereby certify that on this 28th day of October 2015, I caused a copy of the foregoing Objection to Applicant's Motion for a Protective Order and Notice of Joinder, to be sent via email to the persons on the Service List on this Docket.


Anthony I. Blenkinsop