

involvement in the submission of a nomination form to the ITU, and those relating to the Confidential Settlement Agreement between the USAT and the SG be produced.

USAT is concerned that the Order precluded the ability of USAT to object to the discovery requests served by Ms. Merson on February 10, 2015, the objections to which would be due February 25, 2015. The concern arose from the mention in the Order that the Parties appeared to be operating based on the November 17, 2014 discovery requests and motion to compel the SG's testimony. While USAT responded to the Motion to Compel of November 17, 2014, it was noted in USAT's request for clarification that Ms. Merson had re-served discovery on USAT on February 10, 2015, which was not before the Arbitrator.

The Order of Wednesday morning, February 24, 2015, does not preclude the right of USAT to object to the discovery requests of Ms. Merson which have not already been addressed. That Order dealt solely with the matters specifically addressed therein, and as to which, as noted in the Order, the USAT sought only an order protecting the confidentiality of the information to be disclosed. There is no other motion to compel, nor objection to production before the Arbitrator.



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