

EC-2023-0395

Brett Felber
Vs
Ameren Missouri

Response To Counsels Data Request

Golden Rule doesn't apply to lawsuits filed outside of the commission's Jurisdiction. In addition, the Golden Rule can't be applied because counsel hasn't followed the rules of discovery nor has he or she replied with a general denial to the lawsuit in Texas.

The commission has no authority, nor does Judge Clark have the power to request discovery for a lawsuit that doesn't pertain to the commission or can he make a ruling for a lawsuit in Texas.

Counsel is trying to commit Tortious Interference

In addition, counsel is using Rambo Lawyer Litigation Tactics.

Counsel is using aggressive tactics to divert from the real issues here. Every discovery item that counsel has, contradicts what he's written or submitted in statements to the commission.

Counsel knows that lawsuits filed against Ameren and other parties will most likely result in favor of the complainant and a ruling in favor of the complainant, as Ameren has had a generous amount of time to rectify the situations and have failed to do so.

It would be Tortious Interference though to send a lawsuit or any lawsuit data to a party outside of a commission complaint and where counsel has failed to respond to the proper jurisdiction about the lawsuit in question without answering the citation.

I believe counsel though wants to divert the real issues involved here and we can discuss those at the pre-hearing conference.

Brett Felber