

From: [Jim Lowery](#)
To: [Tripp](#); [Tatro, Wendy K \(WTatro@ameren.com\)](#); [Hernandez, Jennifer L](#)
Cc: [Jacqueline Whipple](#); [Betty Hampton](#)
Subject: Re: Ameren Missouri's First Set of Data Requests to City of Fulton, City of Marceline, City of New Madrid, Hannibal Board of Public Works, and Kirkwood Electric
Date: Tuesday, March 24, 2026 11:00:11 AM

Seems very clear to me that our discovery could reveal additional disputed facts.

From: Tripp <Tripp@jblawllc.com>
Sent: Tuesday, March 24, 2026 8:43 AM
To: Peggy Whipple <peggy@healylawoffices.com>; Jim Lowery <lowery@jblawllc.com>; Tatro, Wendy K (WTatro@ameren.com) <wtatro@ameren.com>; Hernandez, Jennifer L <jhernandez2@ameren.com>
Cc: Jacqueline Whipple <jacqueline.whipple@dentons.com>; Betty Hampton <betty@healylawoffices.com>
Subject: Re: Ameren Missouri's First Set of Data Requests to City of Fulton, City of Marceline, City of New Madrid, Hannibal Board of Public Works, and Kirkwood Electric

Thank you for the clarification. I will be in touch. Mike

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From: Peggy Whipple <peggy@healylawoffices.com>
Sent: Tuesday, March 24, 2026 10:42:42 AM
To: Tripp <Tripp@jblawllc.com>; Jim Lowery <lowery@jblawllc.com>; Tatro, Wendy K (WTatro@ameren.com) <wtatro@ameren.com>; Hernandez, Jennifer L <jhernandez2@ameren.com>
Cc: Jacqueline Whipple <jacqueline.whipple@dentons.com>; Betty Hampton <betty@healylawoffices.com>
Subject: RE: Ameren Missouri's First Set of Data Requests to City of Fulton, City of Marceline, City of New Madrid, Hannibal Board of Public Works, and Kirkwood Electric

You don't often get email from peggy@healylawoffices.com. [Learn why this is important](#)

I don't believe we need an RLJ at this point. My possibly-generous reading of 20 CSR 4240-2.090(8) indicates that we lawyers should talk by telephone or in person before I file a motion to stay this discovery. Clearly, it's easier and cheaper for our clients for us to talk by telephone, so of course that is my suggestion.

Peggy

Peggy A. Whipple
Healy Law Offices, LLC
peggy@healylawoffices.com
417-864-7018

From: Tripp <Tripp@jblawllc.com>
Sent: Tuesday, March 24, 2026 10:36 AM
To: Peggy Whipple <peggy@healylawoffices.com>; Jim Lowery <lowery@jblawllc.com>; Tatro, Wendy K (WTatro@ameren.com) <wtatro@ameren.com>; Hernandez, Jennifer L <jhernandez2@ameren.com>
Cc: Jacqueline Whipple <jacqueline.whipple@dentons.com>; Betty Hampton <betty@healylawoffices.com>
Subject: Re: Ameren Missouri's First Set of Data Requests to City of Fulton, City of Marceline, City of New Madrid, Hannibal Board of Public Works, and Kirkwood Electric

Peggy, is your request simply for a conversation as to whether we will withdraw our requests or do you mean to include an ALJ? Just seeking clarification.

Thanks,
Mike

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From: Peggy Whipple <peggy@healylawoffices.com>
Sent: Tuesday, March 24, 2026 10:23:56 AM
To: Jim Lowery <lowery@jblawllc.com>; Tripp <Tripp@jblawllc.com>; Tatro, Wendy K (WTatro@ameren.com) <wtatro@ameren.com>; Hernandez, Jennifer L <jhernandez2@ameren.com>
Cc: Jacqueline Whipple <jacqueline.whipple@dentons.com>; Betty Hampton <betty@healylawoffices.com>
Subject: FW: Ameren Missouri's First Set of Data Requests to City of Fulton, City of Marceline, City of New Madrid, Hannibal Board of Public Works, and Kirkwood Electric

Good morning, Ameren Counsel,

Please advise as to a date and time today or tomorrow for a telephone conference about the attached Data Requests you served on my clients on March 19th.

Because of the pendency of my clients' motion for summary disposition, your Data Requests fail to comply with 20 CSR 4240-2.117(D), Missouri Rule of Civil Procedure 74.04 and the law of *Acoma Dev., LLC v. Com. Tower Place*, 725 S.W.3d 610, 616-618 (Mo. App. W.D. 2025). Thus, I will have to draft and serve objections and a motion to stay discovery no later than March 29th, unless you will agree to withdraw your Data

Requests.

As we have always afforded each other every professional courtesy, I look forward to discussing and resolving this matter with you,

Peggy

Peggy A. Whipple
Healy Law Offices, LLC
peggy@healylawoffices.com
417-864-7018

From: MORegParalegals <MORegParalegals@ameren.com>
Sent: Thursday, March 19, 2026 2:27 PM
To: jacqueline.whipple@dentons.com; Peggy Whipple <peggy@healylawoffices.com>; chandler.hiatt@dentons.com
Cc: Nathan Williams <staffcounsel@psc.mo.gov>; Tiffany Hildebrand <opcservice@opc.mo.gov>; Pringle, Travis <Travis.Pringle@psc.mo.gov>; Tatro, Wendy K <WTatro@ameren.com>; Hernandez, Jennifer L <JHernandez2@ameren.com>; Mike Tripp <tripp@jblawllc.com>; Ameren Missouri Service <AmerenMOService@ameren.com>
Subject: Ameren Missouri's First Set of Data Requests to City of Fulton, City of Marceline, City of New Madrid, Hannibal Board of Public Works, and Kirkwood Electric

You don't often get email from moregparalegals@ameren.com. [Learn why this is important](#)
Counsel,

Attached for service are the following:

- Ameren Missouri's First Set of Data Requests to City of Fulton
- Ameren Missouri's First Set of Data Requests to City of Marceline
- Ameren Missouri's First Set of Data Requests to City of New Madrid
- Ameren Missouri's First Set of Data Requests to Hannibal Board of Public Works
- Ameren Missouri's First Set of Data Requests to Kirkwood Electric

Sincerely,
Crystal Tassello

.....
Missouri Regulatory Paralegal II :: Legal Department :: Ofc (618) 340-4595
Ameren Missouri :: 1901 Chouteau Avenue, MC 1310 :: St. Louis, MO 63103
.....

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