

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Cheri Meadows,)	
)	
Complainant,)	
)	Case No. EC-2025-0136
v.)	
)	
)	
Grain Belt Express, LLC,)	
)	
Respondent)	

MOTION TO COMPEL DISCOVERY

COMES NOW, I, Cheri Meadows, for my Motion to Compel Discovery states as follows:

1. On May 16 and June 18, 2025, I submitted data requests (“DR”) 18 and 22 to Grain Belt Express, LLC (“Grain Belt Express”).

2. DR 18 request was for communication between Jason Brown from Grain Belt Express and Greg Smith from Contract Land Service/CLS after Jason Brown admitted in front of me during our in-person meeting on March 28, 2024 that he and Greg had talked about me “a lot”.

3. My DR 18 reads:

During the visit to my house on March 28, 2024 as Jason Brown, Greg (Contract Land Services/CLS), Jordan (Invenergy) and I stood around talking, Jason Brown said that he and Greg had talked about me a lot. Please provide any notes/emails/texts/memos/voicemails/transcripts/or any other communication from Greg Smith or Jason Brown regarding those conversations that admittedly took place between Jason Brown and Greg Smith from CLS regarding me and my property both prior to and after our meeting.

4. Grain Belt Express objected to DR 18, "...to the extent this question calls for materials that are subject to attorney-client privilege, the work product doctrine, or any other privileged communication..."

5. During the Discovery Conference held on June 12, 2025, Judge Clark indicated that the privacy log I requested be provided would only be required if Grain Belt Express and myself couldn't work out the issues of what was discussed ourselves.

6. After our meet and confer on June 27, 2025, Anne Callenbach and I were able to work out some of the other DR issues that I had raised, but DR 18 was left unresolved, so at this time, I would like to request a privilege log be required by Grain Belt Express.

7. My DR 22 from June 18, 2025 read:

According to Grain Belt Express, LLC's Route Selection Study (Schedule AB-2, Section 2.4.2), windshield surveys and field reconnaissance were conducted on conceptual routes and potential routes.

Please list the dates of those windshield surveys and reconnaissance trips that were done regarding my property. Also, please list who was present during them and all documentation from them regarding my property.

8. Grain Belt Express responded, "Grain Belt Express objects to this data request in that it is irrelevant to Ms. Meadows' additional allegations in this case and outside the scope of discovery at this phase of the proceeding, which is limited to discovery concerning Complainant's additional allegations."

9. Grain Belt Express has chosen to interpret the Order Directing Filings, Reopening Discovery, and Canceling Evidentiary Hearing that was issued on and effective April 23, 2025 in a way that benefits them and not necessarily how it was intended based on how it was written. I did not interpret the Order as they did and thus have continued to try to pursue relevant information for my case to the best of my ability as my time allows me to go through the

numerous filing associated with previous filings of my current case as well as File No. EA-2023-0017, which is very large.

10. The information I am seeking regarding DR 18 and 22 is relevant to my case in its entirety and should be provided per 20 CSR 4240-2.090.

WHEREFORE, I respectfully request that the Commission compel Grain Belt Express to provide a privilege log to my data request 18 and a full and complete response to my data requests 22.

Respectfully Submitted,

/s/ Cheri Meadows

Cheri Meadows