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April 23, 2019

By Email

Barry Learmonth, Q.C. and Irene Muzychka, Q.C.
Commission Counsel
Commission of Inquiry
Respecting the Muskrat Falls Project
Beothuk Building, Suite 502
20 Crosbie Place
St. John's, NL A1B 3Y8

Dear Counsel:

RE: Lance Clarke
Reply to Summons to Produce dated 11 April 2019

Further to the above noted Summons issued to Mr. Lance Clarke, Mr. Clarke advises that he has no documents and/or communications of which the said Summons requires production and advises that,

- He was never issued a "Nalcor cellular phone" but has used a personal cellular phone throughout his employ with Nalcor. Mr. Power has searched the data contained on that phone in compliance with the said Summons;
- He has no text messages on his cellular phone because he deletes all messages every 30 days to free up space on his cellular phone; and
- He would not have used the medium of Facebook, Twitter, Instagram or LinkedIn to communicate matters relating to the Lower Churchill Project, Nalcor Energy or this Inquiry.
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Trusting you will find the foregoing to be satisfactory. If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

BENSON BUFFETT PLC INC.



DEBORAH L.J. HUTCHINGS, Q.C.

DLJH/