

STATE OF SOUTH DAKOTA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

IN RE HEARING FOR REISSUING)	
THE GENERAL WATER POLLUTION)	
CONTROL PERMIT FOR)	OBJECTION TO MOTION
CONCENTRATED ANIMAL)	TO PRESENT NARRATIVE
FEEDING OPERATIONS)	TESTIMONY
)	

COMES NOW the Intervenor Dakota Rural Action (“DRA”), by and through its attorney of record, Kelsea K. Sutton, and for its objection to the Department of Environment and Natural Resources (“DENR”) Feedlot Permit Program’s **Motion to Present Narrative Testimony** presents the following:

1. DRA objects to the Motion in its entirety;
2. The narrative format is improper for this hearing because it makes it very difficult for opposing counsel to raise objections, and makes it especially difficult to preserve those objections on the record;
3. The narrative format allows potentially inadmissible testimony to be admitted on the record and considered by the fact finder before opposing counsel has the ability to object;
4. The narrative format is likely to lead to a confusing and inarticulate record.

For these reasons, I respectfully request that the Motion to Present Narrative Testimony be denied.

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 16th day of September 2016, she served a copy of this **Objection to Motion to Present Narrative Testimony** by email upon the following parties of record:

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