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**SOAH DOCKET NO. 473-10-1097
PUC DOCKET NO. 37448**

APPLICATION OF LCRA
TRANSMISSION SERVICES
CORPORATION TO AMEND ITS
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE
GILLESPIE TO NEWTON 345-KV
CREZ TRANSMISSION LINE IN
GILLESPIE, LLANO, SAN SABA,
BURNET, AND LAMPASAS
COUNTIES, TEXAS

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

10/24/22 PM 2:59
FILED
FILING CLERK

**NOTICE OF INTENDED DESIGNATION AND FILING OF OMITTED PARTS OF
DEPOSITION OF KAREN H. CLARY, Ph.D. AND MOTION FOR ORDER
REGARDING THAT DEPOSITION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Certain parties have filed and probably will file the Deposition of Dr. Karen Clary, Ph.D., or portions thereof. To the extent there is any portion of her deposition or exhibits, which are not so designated, Intervenor J17 Ranch designates those omitted portions of her deposition and exhibits for introduction into evidence at the hearing of this case, as rebuttal evidence and otherwise, such as cross-examination testimony.


Instead of the parties unnecessarily burdening the record with piecemeal and duplicative filings of that deposition and exhibits, J17 Ranch prays that an order be entered, that a single complete copy of Dr. Clary's deposition and exhibits be designated and used for introduction into evidence at the hearing in the Docket, subject to parties' objections. It would be appropriate for the original deposition and exhibits to be used for that purpose.

Rather than the parties selecting certain portions of the deposition and excluding others to try to attack the conclusion of the TPWD, J17 Ranch submits that it would be best to have the entire deposition before the ALJ and the Commission, not only to give the most accurate and complete description of the conclusions of TPWD, but also to show the depth and breadth of the work that was done by TPWD in this matter.

Respectfully submitted,

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By:


Jeffery L. Hart
State Bar No. 09147300

J. Bruce Bennett
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ATTORNEYS FOR J17 RANCH

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2010, a true and correct copy of the foregoing document was served via email notice, or by facsimile, U.S. mail and/or hand delivery to all parties of record.


Jeffery L. Hart