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APPLICATION OF INLINE DEVELOPMENT LLC FOR A RATE/TARIFF CHANGE \$ \$ \$

PUBLIC UTILITY COMMISSION FILING CLERK
OF TEXAS

INLINE DEVELOPMENT LLC'S MOTION TO MODIFY THE PROCEDURAL SCHEDULE

COMES NOW Inline Development LLC ("Inline"), by and through its attorneys of record, and files this Motion to Modify the Procedural Schedule and would show the following:

I. BACKGROUND

On August 28, 2014, Inline filed an Application for a Water and Sewer Rate/Tariff Change (the "Application") with the Public Utility Commission of Texas (the "Commission"). On August 17, 2015, the Administrative Law Judge ("ALJ") issued Order No. 11 and set a deadline of September 4, 2015 for Inline to provide additional information for its Application and September 25, 2015 as the deadline for Commission Staff to file a recommendation or request a hearing. On August 26, 2015, Commission Staff filed a Joint Motion to Abate the Procedural Schedule until November 2, 2015. On August 31, 2015, the ALJ granted the abatement request.

II. REQUEST FOR AN ADDITIONAL ABATEMENT

Inline and Commission Staff have conducted meetings to discuss additional information that Commission Staff needs to complete its review of Inline's Application. In response to these discussions, Inline has engaged a consultant to perform a trending study, and Inline is assisting its consultants with the preparation of that study. However, preparation of the study has been temporarily delayed because Inline's President, Mike Martz, has also been tasked with addressing the needs of a close family friend who is experiencing serious medical and financial

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issues. These unanticipated duties have consumed a significant amount of his time over the past forty five days. While Mr. Martz has now been able to provide its consultants with much of the information needed to perform the study and significant progress has been made, Mr. Martz anticipates the medical and personal needs of his family friend will consume the bulk of his time for the next couple of weeks.

As a result, Inline now requests that the procedural schedule in this matter be modified to afford Inline an additional 30 days, to December 2, 2015, to complete and file of the trending study with the Commission. At that time, the parties will file a status report or a procedural schedule for proceeding with the Application. Inline has been in contact with the attorney for the Commission, and it understands that Staff has no objection to this extension request.

Respectfully submitted,

LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C.

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ATTORNEYS FOR INLINE DEVELOPMENT LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax, hand-delivery and/or regular, first class mail on this 26th day of October, 2015, to the parties of record.

David J. Klein