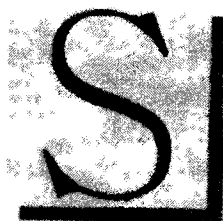


Control Number: 43146



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Addendum StartPage: 0



Mary K. Sahs, P.C.

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PUBLIC UTILITY COMMISSION
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RULE 11 AGREEMENT

April 1, 2016

Ms. Helen S. Gilbert
GILBERT WILBURN, PLLC
7000 N. MoPac Expwy, Suite 200
Austin, Texas 78731

Sent via email with read receipt requested: hgilbert@gwtxlaw.com

RE: SOAH Docket No. 473-16-2033.WS, PUC Docket No. 43146, *Complaint of Carol D. Gillespie against Avalon Water Supply and Sewer Services Corporation (37985-1)*

Rule 11 Agreement

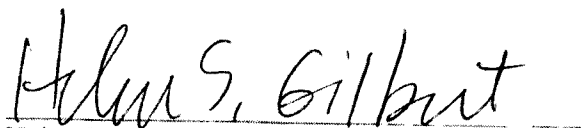
Dear Ms. Gilbert:

This serves as a Rule 11 Agreement between the parties in the matter referenced above, as follows:

1. The request for ballot applications in Complainant's Request for Production 1-1 does not include a request for social security numbers or driver's license numbers. To the extent they are included on the ballot applications, Avalon Water Supply and Sewer Services Corporation may redact that information and no privilege log is required.
2. Complainant's Request for Production 1-29 does not seek electronic mail or emails that are attorney-client communications.
3. Complainant's Request for Production 1-35 seeks all electronic mail or emails between Directors of the Board from January 1, 2011 – present.
4. Complainant's Request for Production 1-35 does not seek electronic mail or emails that are attorney-client communications.
5. Avalon's response is due by 3 p.m. on April 18, 2016.

Sincerely,


Mary K. Sahs
Attorney for Avalon



Helen S. Gilbert
Attorney for Carol D. Gillespie
Cc: All parties of record

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