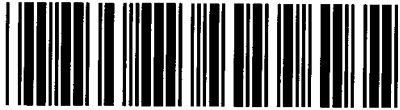




Control Number: 43572



Item Number: 80

Addendum StartPage: 0

House Bill (HB) 1600 and Senate Bill (SB) 567 83rd
Legislature, Regular Session, transferred the functions
relating to the economic regulation of water and sewer
utilities from the TCEQ to the PUC effective
September 1, 2014

Jenkins & Gilchrist

A PROFESSIONAL CORPORATION

401 CONGRESS AVENUE
SUITE 2500
AUSTIN, TX 78701-3799

(512) 499-3800
FACSIMILE (512) 499-3810

www.jenkins.com

Janessa M. Glenn
(512) 499-3858
jglenn@jenkens.com

RECEIVED
CHICAGO, ILLINOIS
(312) 425-3900
2019 NOV 13 AM 11:00
DALLAS, TEXAS
(214) 855-4500
HOUSTON, TEXAS
(713) 951-3300
PUBLIC UTILITY COMMISSIO.
LOS ANGELES, CALIFORNIA
(310) 820-8800
PASADENA, CALIFORNIA
(626) 578-7400
SAN ANTONIO, TEXAS
(210) 246-5000
WASHINGTON, D.C.
(202) 326-1500

July 18, 2006

Docket Clerk
State Office of Administrative Hearings
300 W. 15th Street
Austin, Texas 78701

Via Courier

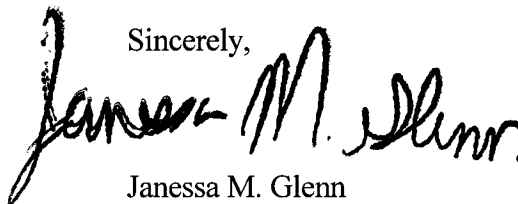
Re: State Office of Administrative Hearing Docket No. 582-03-3275;
TCEQ Docket No. 2003-0664-UCR *In Re: The Application of Bexar
Metropolitan Water District to Amend Water CCN No. 10675 in Bexar Met*

Dear Clerk:

Enclosed for filing is the original and two copies of a Motion and Order to Withdraw as Co-Counsel for BSR Water Company Please file-stamp the extra copy and return it to us with the courier.

Thank you for your assistance in this matter. If there are any questions or problems, please feel free to contact my secretary, Ly Nguyen, at 512-499-3879.

Sincerely,


Janessa M. Glenn

JMG:ltn

Enclosures

cc (w/encl.): Parties of Record *(Via Facsimile & First Class Mail)*

SOAH DOCKET NO. 582-03-3725
TCEQ DOCKET NO. 2003-0664-UCR

IN RE: THE APPLICATION OF BEXAR § BEFORE THE STATE OFFICE
METROPOLITAN WATER DISTRICT §
TO AMEND WATER CCN NO. 10675 IN § OF
BEXAR COUNTY § ADMINISTRATIVE HEARINGS

MOTION TO WITHDRAW AS CO-COUNSEL FOR BSR WATER COMPANY

TO THE HONORABLE CASSANDRA J. CHURCH:

David L. Earl and the firm of Earl & Associates, P.C. files this Motion to Withdraw as co-counsel for BSR Water Company (Sneckner Partners, Ltd.) and, as grounds therefore, would respectfully show the Court as follows:

1. BSR Water Company (Sneckner Partners, Ltd.) is currently represented by David L. Earl of Earl & Associates, P.C. ("Earl"), and Janessa Glenn and Seagal V. Wheatley of Jenkins & Gilchrist. Earl wishes to withdraw as counsel of record for BSR Water Company (Sneckner Partners, Ltd.); however, Janessa Glenn and Seagal V. Wheatley of the firm of Jenkins & Gilchrist will continue to represent BSR Water Company (Sneckner Partners, Ltd.) in the referenced matter.

2. BSR Water Company (Sneckner Partners, Ltd.) has no objection to the withdrawal of Mr. Earl and the firm of Earl & Associates, P.C.


3. The withdrawal of David L. Earl and the firm of Earl & Associates, P.C. is not sought for purposes of delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, David L. Earl and the firm of Earl & Associates, P.C. prays that this Court allow Mr. Earl and the firm of Earl & Associates, P.C. to

withdraw as co-counsel in the above-referenced matter for BSR Water Company (Sneckner Partners, Ltd.), and for such other and further relief, to which it may be justly entitled.


Respectfully submitted,

EARL & ASSOCIATES, P.C.
111 Soledad, Suite 1111
San Antonio, TX 78205
(210) 222-1500 Telephone
(210) 222-9100 Facsimile

By: 
David L. Earl
State Bar No. 06343030

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing document has been forwarded in accordance with the Texas Rules of Civil Procedure to all parties listed on the attached mailing list on the 18th day of June 2006.


David L. Earl
Jessica Glenn
James M. Durr

Jun: 19. 2006 4:38PM

Freeman & Corbett, LLP

No. 1526 P. 5/6

MAILING LIST**TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY****Todd Burkey & Todd Galiga
Attorney
Texas Commission on Environmental Quality
MC-175
P.O. Box 13087
Austin, TX 78711-3087
Fax: (512) 239-3434****TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY****Docket Clerk
Office of the Chief Clerk
Texas Commission on Environmental
Quality
MC-105
PO Box 13087
Austin, TX 78711-3087
Fax: (512) 239-3311****OFFICE OF PUBLIC INTEREST COUNSEL
OF THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY****Blas Coy, Jr.
Office of the Public Interest Council
Texas Commission on Environmental Quality
MC-103
P.O. Box 13087
Austin, TX 78711-3087
Fax: (512) 239-6377****BEXAR METROPOLITAN WATER
DISTRICT****Robert Wilson III
R. L. Wilson, P.C.
P.O. Box 831583
San Antonio, TX 78283
Fax: (210) 223-4200****Adolfo Ruiz
Bexar Metropolitan Water District
2047 W. Malone
San Antonio, TX 78225
Fax: (210) 922-5152**

Jun. 19. 2006 4:38PM

Freeman & Corbett, LLP

No. 1526 P. 6/6

**BSR WATER COMPANY
(SNECKNER PARTNERS, LTD.)**

**David L. Earl
Law Offices of Earl & Brown
A Professional Corporation
River View Towers
111 Soledad Street, Suite 1111
San Antonio, TX 78205
Fax: (210) 222-9100**

**Janessa Glenn
Jenkins & Gilchrist
A Professional Corporation
401 Congress Avenue, Suite 2500
Austin, TX 78701-3799
Fax: (512) 404-3520**

**Seagal V. Wheatly
Jenkins & Gilchrist
A Professional Corporation
Weston Centre, Suite 900
112 E. Pecan Street
San Antonio, TX 78205
(210) 246-5999**

WATER SERVICES, INC.

**Mark H. Zeppa
Attorney
4833 Spicewood Springs Road #202
Austin, TX 78759-8436
Fax: (512) 346-6847**

CITY OF BULVERDE

**Bruce Wasinger
Attorney
Bickerstaff, Heath, Smiley, Pollen, Kever &
McDaniel, LLP.
816 Congress Avenue, Suite 1700
Austin, TX 78701-2443
(512) 320-5638**

SAN ANTONIO WATER SYSTEM

**Jim Mathews
MATHEWS & FREELAND, L.L.P.
P.O. Box 1568
Austin, Texas 78768-1568
Fax: (512) 703-2785**

SOAH DOCKET NO. 582-03-3725
TCEQ DOCKET NO. 2003-0664-UCR

IN RE: THE APPLICATION OF BEXAR § BEFORE THE STATE OFFICE
METROPOLITAN WATER DISTRICT §
TO AMEND WATER CCN NO. 10675 IN § OF
BEXAR COUNTY § ADMINISTRATIVE HEARINGS

**ORDER GRANTING MOTION TO WITHDRAW
AS CO-COUNSEL FOR BSR WATER COMPANY**

On this day came on to be considered, the Motion to Withdraw as Co-Counsel for BSR Water Company filed by David L. Earl and the firm of Earl & Associates, P.C. (the "Motion"). The Court, after considering the Motion is of the opinion that the Motion should be and is hereby GRANTED.

It is therefore ORDERED that:

- 1. David L. Earl and the firm of Earl & Associates, P.C. is granted permission to withdraw as co-counsel for BSR Water Company (Sneckner Partners, Ltd.); and
- 2. All communications sent by SOAH and other parties pertaining to the referenced case shall be sent to Janessa Glenn, Seagal V. Wheatley and the firm of Jenkins & Gilchrist will continue representing BSR Water Company (Sneckner Partners, Ltd.) in the above-referenced matter.

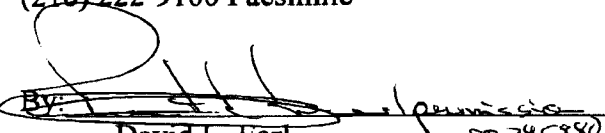
SIGNED this _____ day of _____, 2006.

Honorable Cassandra J. Church

AGREED:

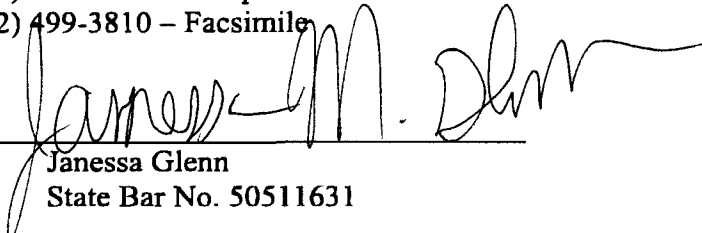
EARL & ASSOCIATES, P.C.

111 Soledad, Suite 1111
San Antonio, TX 78205
(210) 222-1500 Telephone
(210) 222-9100 Facsimile

By: 
David L. Earl
State Bar No. 06343030

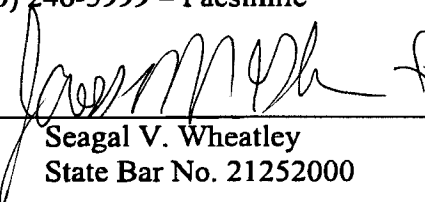
JENKENS & GILCHRIST

600 Congress Avenue
Austin, Texas 78701
(512) 499-3858 – Telephone
(512) 499-3810 – Facsimile

By: 
Janessa Glenn
State Bar No. 50511631

JENKENS & GILCHRIST

112 East Pecan, Suite 900
San Antonio, Texas 78205
(210) 246-5348 – Telephone
(210) 246-5999 – Facsimile

By:  for: Seagal Wheatley
Seagal V. Wheatley
State Bar No. 21252000
w/ permission
State Bar No.
50511631