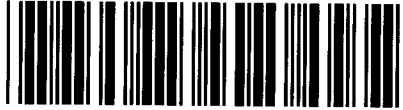


Control Number: 43585



Item Number: 39

Addendum StartPage: 0

House Bill (HB) 1600 and Senate Bill (SB) 567 83<sup>rd</sup>  
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



**ARMBRUST & BROWN, L.L.P.**  
ATTORNEYS AND COUNSELORS

100 CONGRESS AVENUE, SUITE 1300  
AUSTIN, TEXAS 78701-2744  
512-435-2300

FACSIMILE 512-435-2360

**FACSIMILE COVER PAGE**

Date: July 1, 2003

NAME:	COMPANY:	FACSIMILE NO.:	TELEPHONE NO.:
Scott Humphrey	TCEQ - MC 103	(512) 239-6377	(512) 239-6363
John Deering Geoffrey Kirshbaum	TCEQ - MC 173	(512) 239-0626	(512) 239-6363
Mark Zeppa	Law Offices of Mark H. Zeppa, P.C.	(512) 346-6847	

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150694-1 12/02/2002

DOCKET NO. 582-02-3056  
TCEQ DOCKET NOS. 2002-0189-UCR and 2000-0112-UCR

IN THE MATTER OF THE  
APPLICATIONS OF THE CITY OF  
AUSTIN FOR A WATER  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY (NO. 33562-C) AND  
A WASTE WATER CERTIFICATE OF  
CONVENIENCE AND NECESSITY

(NO. 33563-C)

APPLICATION OF HORNSBY

BEND UTILITY COMPANY  
TO AMEND CERTIFICATE  
OF CONVENIENCE AND  
NECESSITY NO. 20650

APPLICATION OF HORNSBY

BEND UTILITY COMPANY  
TO AMEND CERTIFICATE  
OF CONVENIENCE AND  
NECESSITY NO. 11978

§ BEFORE THE STATE OFFICE  
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HORNSBY BEND UTILITY COMPANY'S  
SUPPLEMENTAL RESPONSES TO CITY OF AUSTIN'S REQUESTS FOR DISCLOSURE,  
INTERROGATORIES AND REQUESTS FOR PRODUCTION

TO: The City of Austin, by and through its Attorney of Record, Kenneth Ramirez of  
Bracewell and Patterson, LLP, 111 Congress Avenue, Suite 2300, Austin, Texas 78701

Hornsby Bend Utility Company ("Hornsby Bend") provides the following Supplemental  
Responses to the City of Austin's ("City") Requests for Disclosure, Interrogatories and Requests  
for Production.

SUPPLEMENTAL RESPONSES TO REQUESTS FOR DISCLOSURE

5. Response to request under Rule 194.2(e): The name, address (work and home) and telephone number (work and home) of persons having knowledge of relevant facts, with a brief statement of each person's connection with the case, are as follows:

**David Goodrum**, 5656 Bee Caves Road, Suite 201, Austin, Texas 78746, (512) 306-0073.

David Goodrum is a former ECO Resources employee. He is now working with HBH Development, Inc., which has developed lots for single family residential housing within the Hornsby Bend existing CCN area and is in the process of attempting to develop property adjacent to the existing CCN area of Hornsby.

**Eric Morgan**, ECO Resources, Inc., 9511 Ranch Road 620 North, Austin, Texas.

Eric Morgan is the Supervisor of the daily operations of the Water and Wastewater System for Hornsby Bend Utilities. Eric was not involved with the CCN expansion.

**Tony Graf**, General Manager, Manville WSC, 108 N. Commerce, Coupland, Texas 78615 272-4044.

Manville WSC provides retail water service in portions of the area covered by Hornsby Bend's CCN Applications.

**Karl Moeller**, Attorney, Manville WSC, 816 Congress, Suite 1100, Austin, Texas 78701, (512) 480-2229.

Mr. Moeller is the attorney for Manville WSC.

**John Tresnicky**, Attorney, City of Austin, 114 W. 7th Street, Austin, Texas 78701 974-2159.

Mr. Tresnicky was involved in negotiations with Hornsby Bend regarding utility service.

**Randy Goss**, LCRA, 3700 Lake Austin Blvd, Austin, Texas 78703 473-3589.

Mr. Goss was involved in negotiations with Hornsby Bend regarding utility service.

**Hank Kidwell**, C.E., Murfee Engineering, 1101 Capitol Of Texas Highway South, Building D, Suite 110, Austin, Texas 78746.

Mr. Kidwell has been involved in the preparation of the engineering report by Murfee Engineering regarding Hornsby Bend's CCN Applications.

**Robert Ferguson**, C.E., Murfee Engineering, 1101 Capitol Of Texas Highway South, Building D, Suite 110, Austin, Texas 78746

Mr. Ferguson has been involved in issues dealing with the CCN applications and engineering issues with Hornsby Bend Utility Company matters

**Dan Ryan**, C.E., Murfee Engineering, 1101 Capitol Of Texas Highway South, Building D, Suite 110, Austin, Texas 78746.

Mr. Ryan has been involved in issues dealing with the CCN applications and engineering issues with Hornsby Bend Utility Company matters

**Mike Erdman**, former employee, City of Austin, unknown.

Mr. Erdman was involved in negotiations with Hornsby Bend regarding utility service.

**Toby Futrell**, City of Austin, 114 W. 7th Street, Austin, Texas 78701.

Mr. Futrell was involved in negotiations with Hornsby Bend regarding utility service.

**Pat Reilly**, Regional Manager for Eco Resources, Inc., 9511 Ranch Road 620 North, Austin, Texas 78726, (512) 335-7580.

Eco Resources, Inc. operates the Hornsby Bend Utility System and other water and wastewater systems in Texas.

This list incorporates by reference those persons listed by the other parties to this suit in response to the request to identify persons having knowledge of relevant facts. This list will be supplemented as information becomes available.

6. Response to request under Rule 194.2(f): Utility has not yet designated any experts.

**George Murfee** - Engineer, Murfee Engineering. Will testify regarding plans for water and wastewater system to serve Hornsby Bend's requested CCN areas.

All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony, as required by Rule 194.2(f) have already been produced, with the exception of the final engineering report, which will be produced upon completion.

**Marvin Morgan** - MARVIN B. MORGAN Certified Public Accountant. Will testify regarding financial aspects of plans for serving Hornsby Bend's requested CCN areas.

All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony, as required by Rule 194.2(f) have already been produced, with the exception of a final report, which will be produced upon completion.

7. Response to request under Rule 194.2(g): None known.
8. Response to request under Rule 194.2(h): None known.
9. Response to request under Rule 194.2(i): Utility will provide the City the opportunity to examine and copy responsive documents on an agreed date at an agreed time and location.

10. Response to request under Rule 194.2(j): Not applicable.
11. Response to request under Rule 194.2(k): Not applicable.

SUPPLEMENTAL RESPONSES TO FIRST SET OF INTERROGATORIES

**INTERROGATORY NO. 1:**

Please provide a list of all the fact witnesses that Hornsby Bend intends to use during the evidentiary hearing, their names, business addresses and phone numbers and a brief description of the content of the testimony that Hornsby Bend expects each of these witnesses to provide.

**RESPONSE:**

**David Goodrum:**

5656 Bee Caves Road, Suite 201, Austin, Texas 78746, (512) 306-0073.

Mr. Goodrum will testify about HBH's need for services, and about services requested by other parties during his employment with Eco Resources.

**Tony Elmer:**

Eco Resources, 9511 Ranch Road 620 North, Austin, Texas 78726-2908, (512) 335-7580, (512) 335-0251 {fax}.

Mr. Elmer will testify about current Hornsby Bend system operations

**Bill Jasura:**

ECO Resources, Inc., 9511 RR 620 North, Austin, Texas 78726-2908, (512) 335-7580, (512) 335-0251 {fax}.

Mr. Jasura will testify about Hornsby Bend's financial and management issues.

**Mike Quinn:**

Suburban Water Systems, 1211 E. Center Court Drive, Covina, CA 91724, (626) 543-2500.

Mr. Quinn will testify about Hornsby Bend's financial and management issues.

**Steve Held:**

ECO Resources, Inc., 9511 RR 620 North, Austin, Texas 78726-2908, (512) 335-7580, (512) 335-0251 {fax}.

Mr. Held will testify about Eco Resources' capabilities and experience in operating water and wastewater utilities.

SUPPLEMENTAL RESPONSES TO SECOND SET OF INTERROGATORIES

**INTERROGATORY NO. 1:**

Please explain the relationship or arrangement between Hornsby Bend and each of the individuals and entities listed in Request for Production No. 2 below:

**RESPONSE:**

**David Goodrum**, 5656 Bee Caves Road, Suite 201, Austin, Texas 78746, (512) 306-0073.



David Goodrum is a former ECO Resources employee. He is now working with HBI Development, Inc., which has developed lots for single family residential housing within the Hornsby Bend existing CCN area and is in the process of attempting to develop property adjacent to the existing CCN area of Hornsby.

SUPPLEMENTAL RESPONSES TO FIRST REQUESTS FOR PRODUCTION

RESPONSES TO REQUESTS FOR PRODUCTION - WATER

**REQUEST FOR PRODUCTION NO. 1:**

Please produce all correspondence between Hornsby Bend and TCEQ related to 1) enforcement issues; and 2) investigations or inquiries undertaken by TCEQ into Hornsby Bend's management or operation of its water facilities.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 3:**

Please produce any written service extension requests for service by Hornsby Bend that Hornsby Bend has received for water service within the City's proposed water service area since 1990.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 5:**

Please produce all documents relating to monthly and annual water losses (i.e., the difference between amounts pumped and amounts billed) from Hornsby Bend's facilities since January 1, 1999.

**RESPONSE:** Supplemental documents responsive to this request, to the extent they exist, are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 6:**

Please produce all documents relating to any pump tests for wells conducted by or on behalf of Hornsby Bend, including any correspondence with or comments by other entities regarding these tests.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 8:**

Please produce all documents relating to any contract, agreement, memorandum of understanding or other type of document memorializing a relationship or arrangement between Hornsby Bend and any of the following: Thom Farrell, Steve Stratton, Dave Goodrum, Latus Prikryl and Metro H2O

**RESPONSE:** Utility objects to this Request as it seeks information that is not relevant or material to any issue in this civil action, and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving the foregoing objection, supplemental information that is not subject to this objection is available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 9:**

Please produce any fully executed non-standard or other types of service agreements for water service by Hornsby Bend within five miles of the City's proposed water service area, which were effective as of January 1, 1990 or any time through the date of receipt of this request.

**RESPONSE:** Utility objects to this Request as it is overbroad, is not reasonably calculated to lead to admissible evidence, and is outside the scope of TRCP 192.3.

Without waiving the foregoing objection, supplemental information that is not subject to this objection; is available for inspection at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 10:**

Please produce any documents (including maps) showing, identifying, or depicting, any and all water infrastructure owned and operated by Hornsby Bend in the City's proposed water service area, including, but not limited to, water treatment plants, water wells, well fields, storage tanks, pump stations, chemical treatment facilities, transmission lines, distribution lines, and valves.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 11:**

Please produce any documents (including maps) showing, identifying, or depicting, any and all water infrastructure owned and operated by Hornsby Bend within five miles of the City's proposed water service area, including, but not limited to, water treatment plants, water wells, well fields, storage tanks, pump stations, chemical treatment facilities, transmission lines, distribution lines, and valves.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**RESPONSES TO REQUESTS FOR PRODUCTION - SEWER****REQUEST FOR PRODUCTION NO. 17:**

Please produce all correspondence between Hornsby Bend and TCEQ related to 1) enforcement issues; and 2) investigations or inquiries undertaken by TCEQ into the management or operation of its sewer facilities.

**RESPONSE:** Documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 19:**

Please produce any written service extension requests for service by Hornsby Bend that Hornsby Bend has received for sewer service within the City's proposed sewer service area since 1990.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 20:**

Please produce any fully executed non-standard or other types of service agreements for sewer service by Hornsby Bend within five miles of the City's proposed sewer service area, which were effective as of January 1, 1990 or any time through the date of receipt of this request.

**RESPONSE:** Utility objects to this Request as it is overbroad, is not reasonably calculated to lead to admissible evidence, and is outside the scope of TRCP 192.3.

Without waiving the foregoing objection, supplemental information that is not subject to this objection is available for inspection at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 21:**

Please produce any wholesale sewer contracts for service within five miles of the City's proposed sewer service area to which Hornsby Bend is a party.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 22:**

Please produce any documents (including maps) showing, identifying, or depicting, any and all sewer infrastructure owned and operated by Hornsby Bend within five miles of the City's proposed sewer service area, including, but not limited to, wastewater treatment plants, collection lines, transmission mains, lift stations and holding ponds.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 24:**

Please produce two most recent annual billing summaries for its sewer customers within five miles of the City's proposed sewer service area. Please include documents showing the number of billed accounts by meter size, billed usage amounts, and billed revenue by each customer class (e.g., residential, multi-family, commercial, etc.).

**RESPONSE:** Utility objects to this Request as it lacks specificity, and Utility has no means to identify the items requested. Specifically, the request is objectionable because it seeks production of annual billing summaries, which are documents not in existence.

Without waiving the foregoing objection, supplemental information that is not subject to this objection is available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 25:**

Please produce any long-range (more than two years) sewer service plans produced by or on behalf of Hornsby Bend.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

## **RESPONSES TO REQUESTS FOR PRODUCTION - GENERAL**

### **REQUEST FOR PRODUCTION NO. 28:**

Please produce Hornsby's annual operating budgets for the current fiscal year and the last four (4) years, and the proposed or draft budget for the upcoming or fiscal year.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

### **REQUEST FOR PRODUCTION NO. 32:**

Please produce all correspondence between Hornsby Bend or ECO Resources, Inc. and TCEQ regarding enforcement or compliance issues relating to water or sewer utility operations or maintenance work that they have performed for other entities.

**RESPONSE:** Utility objects to this request in that it seeks production of documents that are not in the Utility's possession, custody, or control.

Without waiving the foregoing objection, the Utility will provide supplemental documents not subject to the objection; that is, Utility will produce supplemental correspondence between Hornsby Bend and TCEQ regarding enforcement or compliance issues relating to water or sewer utility operations or maintenance work that the Utility has performed for other entities.

### **REQUEST FOR PRODUCTION NO. 33:**

Please produce any documents and correspondence exchanged with or relating to each of the entities identified in Hornsby Bend's Applications to Amend CCN Nos. 11978 and 20650 as entities requesting service from Hornsby Bend.

**RESPONSE:** Supplemental documents responsive to this request are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

## **SUPPLEMENTAL RESPONSES TO COA'S SECOND REQUESTS FOR PRODUCTION**

### **REQUEST FOR PRODUCTION NO. 2:**

Please produce all documents relating to any contract, agreement, memorandum of understanding or other type of document memorializing a relationship or arrangement between Hornsby Bend and any of the following: Thom Farrell, Steve Stratton, Dave Goodrum, Latius Priktyl, Metro H2O, and Eco Resources. This information is relevant because these individuals and entities appear to have interests in Hornsby Bend and are also involved in the service extension requests that Hornsby Bend is using to show need for service for its applications. If Hornsby Bend does not produce this information, the City will be forced to file a motion to compel the production of these documents.

### **OBJECTION:**

Hornsby Bend objects to this Request as it seeks information that is not relevant or material to any issue in this civil action, and is not reasonably calculated to lead to the discovery of admissible evidence.

**RESPONSE:**

Subject to and without waiving the foregoing objection, Hornsby Bend will produce all documents in its possession related to any contract, agreement, memorandum of understanding or other type of document memorializing a relationship or arrangement between Hornsby Bend and Metro H2O and between Hornsby Bend and Eco Resources.

**REQUEST FOR PRODUCTION NO. 7:**

Please produce documents relating to Hornsby Bend's monthly effluent report data since January 1, 1999.

**RESPONSE:**

Supplemental responsive documents are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 8:**

Please produce documents relating to any plans or designs to increase the capacity of Hornsby Bend's wastewater plant.

**OBJECTION:**

Hornsby Bend objects to this Request as it is so vague and ambiguous, that Defendant is, in good faith, unable to ascertain what information is requested.

**RESPONSE:**

Subject to and without waiving the foregoing objection, assuming City is requesting documents relating to plans to increase the *current* plant capacity, supplemental documents are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 9:**

Please produce documents relating to the ongoing construction of any lines or mains (transmission, collection, or distribution) larger than 10 inches in diameter.

**OBJECTION:**

Hornsby Bend objects to this Request as it is so vague and ambiguous, that Defendant is, in good faith, unable to ascertain what information is requested.

**RESPONSE:**

Subject to and without waiving the foregoing objection, supplemental documents are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 10:**

Please produce documents relating to the ongoing construction of plants, lift stations, pump stations, storage tanks, or holding ponds.

**OBJECTION:**

Hornsby Bend objects to this Request as it is so vague and ambiguous, that Defendant is, in good faith, unable to ascertain what information is requested.

**RESPONSE:**

Subject to and without waiving the foregoing objection, supplemental documents are available for inspection and copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

**REQUEST FOR PRODUCTION NO. 14:**

Please produce any maps or drawings of Hornsby Bend's current treatment, distribution, and collection systems.

**RESPONSE:**

Supplemental documents copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

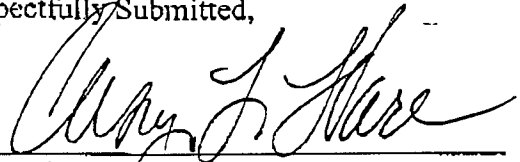
**REQUEST FOR PRODUCTION NO. 15:**

Please produce any maps or drawings showing the location of Hornsby Bend's current customers.

**RESPONSE:**

Supplemental documents copying at the offices of Armbrust & Brown, L.L.P. during normal business hours.

Respectfully Submitted,



**JOHN J. CARLTON**

State Bar No. 03817600

**CASEY L. WARE**

State Bar No. 24033436

**ARMBRUST & BROWN, L.L.P.**

100 Congress Avenue, Suite 1300

Austin, Texas 78701-2744

(512) 435-2300 - Telephone

(512) 436-2360 - Telecopy

**ATTORNEYS FOR HORNSBY BEND  
UTILITY COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been sent to the following on this 2<sup>nd</sup> of July, 2003, to the following:

**Representing Public Interest Counsel:**

Scott Humphrey

Texas Commission on Environmental Quality - MC 103

P.O. Box 13087

Austin, Texas 78711-3087

*Via Facsimile (512) 239-6377*

**Representing Executive Director of TCEQ:**

John Deering

Geoffrey Kirshbaum

Legal Services Division

Texas Commission on Environmental Quality - MC 173

P.O. Box 13087

Austin, Texas 78711-3087

*Via Facsimile (512) 239-0626*

**Representing City of Austin:**

Kenneth Ramirez

Monica Jacobs

Bracewell & Patterson, L.L.P.

111 Congress Avenue, Suite 2300

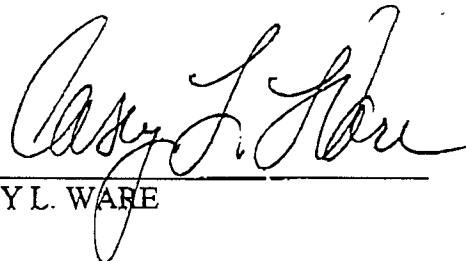
Austin, Texas 78701

*Via Hand Delivery*



**Representing Creedmoor-Maha WSC  
and City of Mustang Ridge:**  
Mark Zeppa  
Law Offices of Mark H. Zeppa, P.C.  
4833 Spicewood Springs Road, Suite 202  
Austin, Texas 78759-8436

*Via Facsimile (512) 346-6847*

A handwritten signature in cursive script, reading "Casey L. Ware", written over a horizontal line.

CASEY L. WARE

