



Control Number: 44010



Item Number: 35

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**SOAH DOCKET NO. 473-15-2123.WS
PUC DOCKET NO. 44010**

**PETITION OF THE RATEPAYERS OF
THE RIVER PLACE WATER AND
WASTEWATER SYSTEMS
APPEALING
THE RETAIL WATER AND
WASTEWATER RATES OF THE
CITY OF AUSTIN**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

20.5.15.20 PM 2:47
PUBLIC UTILITY COMMISSION
FILING CLERK

CITY OF AUSTIN'S FIRST REQUEST FOR INFORMATION TO PETITIONERS

TO: Petitioners, by and through their counsel of record, Randall B. Wilburn, Gilbert Wilburn PLLC, 7000 North MoPac Boulevard, Suite 200, Austin, Texas 78731.

COMES NOW, the City of Austin, in the above styled and docketed water rate appeal proceeding, pursuant to P.U.C. Proc. R. 22.141(b) and Rule 194 of the Texas Rules of Civil Procedure, requests that Petitioners, provide within 20 days of service of this request, the information or material described in Rule 194.2 (a)-(l):

- a. The correct names of the parties to the lawsuit.
- b. The name, address, and telephone number of any potential parties.
- c. The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).
- d. The amount and any method of calculating economic damages.
- e. The name, address, and telephone number of any and all persons having knowledge of any relevant facts, and a brief statement of each identified person's connections with this case.
- f. For any testifying expert:
 1. The expert's name, address, and telephone number:
 2. The subject matter on which the expert will testify:

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3. The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the party to whom this Request is addressed, documents reflecting such information:
4. If the expert is retained by, employed by, or otherwise subject to the control of the party to whom this Request is addressed:
 - A. All documents, tangible things, reports, models, or data compilations that have been provided to, review by, or prepared by or for the experts in anticipations of the expert's testimony; and
 - B. The expert's current resume and bibliography.
- g. Any indemnity and insuring agreements.
- h. Any settlement agreements.
- i. Any witness statements.
- j. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.
- k. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the party to whom this Request is addressed by virtue of an authorization furnished by the requesting party.
- l. The name, address, and telephone number of any person who may be designated as a responsible third party.

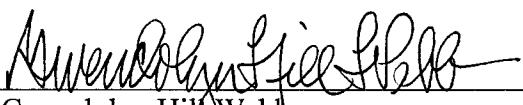
Respectfully submitted,

KAREN KENNARD,
City Attorney

MEITRA FARHADI
Assistant City Attorney

MARIA SANCHEZ
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By: 
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State Bar No. 21026300

Stephen P. Webb
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ATTORNEYS FOR CITY OF AUSTIN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via hand delivery, facsimile, electronic mail, overnight mail, US mail and/or Certified Mail Return Receipt Requested on all parties whose names appear on the mailing list below on this 30th day of March, 2015.

FOR THE PUBLIC UTILITY COMMISSION:

1701 N. Congress Avenue, 7th Floor
PO Box 13326
Austin, Texas 78711-3326
Via Electronic Upload

FOR THE ADMINISTRATIVE LAW JUDGES:

Honorable Lilo D. Pomerleau
Honorable William B. Newchurch
Administrative Law Judges
State Office of Administrative Hearings
300 W. 15th Street, Suite 504
Austin, Texas 78701
Phone: 512-475-4993
Fax: 512-322-2061
Via Electronic Upload

FOR THE SOAH DOCKET CLERK:

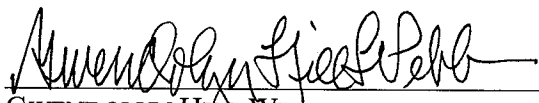
Ms. Monica Luna, Docketing Clerk
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FOR PETITIONERS:

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