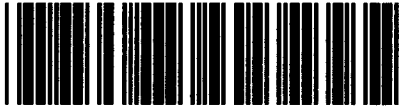


Control Number: 44065



Item Number: 18

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

SOAH DOCKET NO. 582-06-1641
TCEQ DOCKET NO. 2006-0044-UCR

2015 JAN -6 AM 9:05

APPLICATION OF THE CITY OF
PRINCETON TO OBTAIN A WATER
AND SEWER CERTIFICATE OF
CONVENIENCE AND NECESSITY
IN COLLIN COUNTY, TEXAS
APPLICATION NOS. 35072-C & 35073-C

§
§
§
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

SOAH DOCKET NO. 582-06-2663
TCEQ DOCKET NO. 2006-0631-UCR

APPLICATION OF THE CITY OF
MCKINNEY TO AMEND SEWER
CERTIFICATE OF CONVENIENCE
AND NECESSITY NO. 20071
IN COLLIN COUNTY, TEXAS
APPLICATION NO. 35035-C

§
§
§
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**CITY OF MCKINNEY'S REQUESTS FOR INTERROGATORIES,
ADMISSIONS, AND PRODUCTION TO CYNTHIA KAMINSKY, JOHN POWELL,
KAREN & ROBERT FINCH, AND FRED HEBERT**

TO: Cynthia Kaminsky, John Powell, Karen & Robert Finch, and Fred Hebert, by and through
Cynthia Kaminsky, 2782 Briar Trail, McKinney, Texas 75069.

The City of McKinney ("City" or "McKinney") serves this its Requests for Interrogatories, Admissions, and Production on Cynthia Kaminsky, John Powell, Karen & Robert Finch, and Fred Hebert ("Protestants") by and through Cynthia Kaminsky, pursuant to the Texas Rules of Civil Procedure and applicable rules and regulations of the Texas Commission on Environmental Quality and the State Office of Administrative Hearings. Within thirty (30) days of service of this request, Protestants must serve a signed copy of the responses to these requests upon counsel for McKinney, Emily W. Rogers, at the following address: Bickerstaff, Heath, Pollan & Caroom, L.L.P., 816 Congress Avenue, Suite 1700, Austin, Texas 78701-2443.

Respectfully submitted,

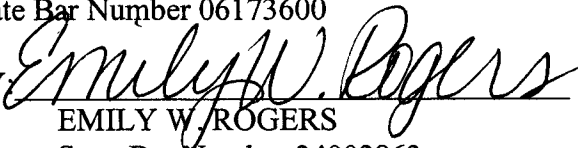
BICKERSTAFF, HEATH,
POLLAN & CAROOM, L.L.P.
816 Congress Avenue

Suite 1700
Austin, Texas 78701-2443
(512) 472-8021
(512) 320-5638 (FAX)

EMILY W. ROGERS
State Bar Number 24002863

WILLIAM D. DUGAT, III
State Bar Number 06173600

BY:


EMILY W. ROGERS
State Bar Number 24002863

ATTORNEYS FOR CITY OF MCKINNEY

A. DEFINITIONS

The following paragraphs state definitions that apply to this Request in its entirety, including the instructions noted below:

1. "McKinney" refers to the City of McKinney, and each of its officers, employees, agents, representatives, attorneys, and all other natural persons, business or legal entities, presently or formerly acting in concert with, under their direct or indirect control of, or on behalf of McKinney.
2. "You," "your," means Protestants, your employees, agents, representatives, attorneys, and all other natural persons, business or legal entities, presently or formerly acting in concert with, under their direct or indirect control of, or on behalf of Protestants.
3. "Document(s)" means all written, typed, or printed matters and all magnetic or other records, paper, or documentation of any kind or descriptions (including, without limitations, letters, correspondence, telegrams, memoranda, notes, minutes, contracts, agreements, notations of telephone or in-person conversations, conferences, inter-office communications, e-mail, microfilm, microfiche, bulletins, circulars, accounts, writings, drawings, graphs, charts, pamphlets, books, facsimiles, invoices, tape recordings, video recordings, photographs, computer printouts and work sheets), including all originals and all drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all writing or recordings of any type or nature, whether or not prepared by you, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former council members, officers, employees, representatives, consultants, accountants, attorneys, agents, other natural persons, business or legal entities, presently or formerly acting in concert with, under their direct or indirect control of, or on behalf of Princeton.
4. "Describe" or "identify," when used in reference to a document, means you must state, to the fullest extent possible, the following:
 - a) The nature (e.g., letter, handwritten note) of the document;
 - b) The title or heading that appears on the document;
 - c) The date of the document and the date of each addendum, supplement, or other addition or change;
 - d) The identity of the author of the document; any signatory(ies) to the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and
 - e) The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.
5. "Describe" or "identify," when used in reference to a natural person, means you must state, to the fullest extent possible, the following:

- a) The full name;
 - b) The present or last known residential address, including zip code;
 - c) The present or last known residential and office telephone number(s);
 - d) The present or last known occupation, job title, employer, and employer's address, including zip code;
 - e) The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular request; and
 - f) In the case of any persons other than an individual, identify the officer, employee, or agent most closely connected with the subject matter of the request, and the officer who is responsible for supervising that officer or employee.
6. "Communication" means an oral or written communication of which Princeton has knowledge, information, or belief.
 7. "File" means any collection or group of documents maintained, held, or stored in folders, notebooks, or other devices for separating or organizing documents.
 8. "Person(s)" means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity, and all other predecessors or successors in interest.
 9. "Concerning" means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, or responding to, showing, describing, analyzing, reflecting, embodying, mentioning, or constituting the subject matter identified in the request.
 10. "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.
 11. The word "and" means "and/or."
 12. The word "or" means "or/and."
 13. CCN means "Certificate of Convenience and Necessity"
 14. "McKinney's Application" or "Application" refers to the Application of the City of McKinney to Amend a Sewer Certificate of Convenience and Necessity No. 2071 in Collin County, Application Nos. 35035-C, TCEQ Docket No. 2006-00631-UCR, SOAH Docket No. 582-06-2663, pending before the Texas Commission on Environmental Quality ("TCEQ") and/or the State Office of Administrative Hearings ("SOAH").
 15. "Requested Area" means the area McKinney is seeking certification in the sewer CCN.

16. "Facilities" means both water and sewer facilities including transmission and collection lines, pump stations, lift stations, treatment plants, storage facilities and all other facilities necessary to provide retail water and sewer service.
17. All definitions found in 30 Tex. Admin. Code Ch. 291 and Ch. 13 are incorporated herein, verbatim.

B. INSTRUCTIONS

1. Protestants are required to answer each of the following interrogatories, requests for admissions, and requests for documents separately by listing the responses and documents by describing them as defined herein. If documents are numbered for production, in each response provide both the information that identifies the document and the document's number.
2. As to any interrogatory, request for admission, or request for production to which you refuse to respond or are unable to respond to in whole or in part, for any reason, please state the grounds for your refusal or inability to respond. When you believe that a complete answer to a particular request for production or part thereof is not possible, please answer each request for production to the extent possible and furnish a statement explaining: 1) the reason for your inability to respond further; and 2) whatever information or knowledge you have concerning the non-responsive portion.
3. For each document or other requested information that you assert is privileged or is not discoverable, identify that document or other requested information, and state the specific grounds for the claim of privilege or other ground for exclusion. Also, for each document you assert is not discoverable, state the date of the document, state the name, job title, and address of the person who prepared it; state the name, address, and job title of the person to whom it was addressed, circulated, or who saw it; state the name, job title, and address of the person now in possession of the document; describe the subject matter of the document; and state the present location and the custodian for the document.
4. For every document that no longer exists or cannot be located, or for any requested information about a document that no longer exists or cannot be located: identify the document; state how and when the document passed out of existence, or when it could no longer be located; and state the reasons(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document that cannot be located.
5. It is requested that all documents that might impact on the subject matter of the Application be preserved and that any ongoing process of document destruction involving such documents cease.
6. Furnish all information available to you and known by you, or in your possession or that of your agents and attorneys, or appearing in your records.
7. In those instances when requested information or requested documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form, or produce the information in a finished usable form that included all necessary glossaries, keys, and indices for interpretation of the material.

8. You are under duty to supplement your answers to these interrogatories, requests for admissions, and requests for production that are incomplete or incorrect when made. Furthermore, you are under a duty to timely amend your answers if you obtain information on the basis of which you know that an answer either: 1) was incorrect or incomplete when made; or 2) although correct and complete when made, is no longer true and complete and the circumstances are such that failure to amend the answer is in substance misleading.
9. Unless stating an objection or asserting a privilege, you must specifically admit or deny each request for admissions or explain in detail the reason that you cannot admit or deny the request. A response must fairly meet the substance of the request. You may qualify an answer, or deny a request in part, only when good faith requires. Lack of information or knowledge is not a proper response unless you state that a reasonable inquiry was made but that the information known or easily obtainable is insufficient to enable you to admit or deny. An assertion that the request presents an issue for trial is not a proper response.

C. INTERROGATORIES

INTERROGATORY NO. 1:

Please state the basis for your contention that McKinney may not spend public tax money on utility projects outside the city limits.

RESPONSE:

INTERROGATORY NO. 2:

If it is your contention that the City of McKinney utilizes tax dollars to fund its utility operations and improvements, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 3:

If it is your contention that McKinney intends to utilize tax dollars to expand its sewer collection system in that area south of U.S. Highway 380 and east of Highway 5, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 4:

If it is your contention that McKinney cannot provide serve to the requested area, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 5:

If it is your contention that McKinney should not be granted a sewer CCN for the area marked as "Area A" on the attached map, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 6:

If it is your contention that McKinney should not be granted a sewer CCN for the area marked as "Area B" on the attached map, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 7:

If it is your contention that McKinney should not be granted a sewer CCN for the area marked as "Area C" on the attached map, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 8:

If it is your contention that McKinney should not be granted a sewer CCN for the area marked as "Area D" on the attached map, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 9:

If it is your contention that McKinney is not financially able to provide service, please state the basis for your contention.

RESPONSE:

INTERROGATORY NO. 10:

Please state the basis for your contention that McKinney is unable to fully service the infrastructure that it has.

RESPONSE:

INTERROGATORY NO. 11:

Please state the basis for your contention that McKinney has exaggerated claims of sewer requests in its CCN application.

RESPONSE:

INTERROGATORY NO. 12:

Please state the basis for your contention that an approval of McKinney's sewer CCN application will damage the existing environment in the south/southeast/east section of the proposed CCN.

RESPONSE:

INTERROGATORY NO. 13:

Please state the basis for your contention that the construction of sewer utility facilities by McKinney will destroy wildlife habitat and wetlands.

RESPONSE:

INTERROGATORY NO. 14:

Please specifically identify the location of the wildlife habitat and wetlands that you claim will be destroyed.

RESPONSE:

INTERROGATORY NO. 15:

Please state the basis for your claim that sewer line act as French drains in wetland areas.

RESPONSE:

INTERROGATORY NO. 16:

Please describe your septic system, including its type, capacity, and date of installation.

RESPONSE:

INTERROGATORY NO. 17:

Please state the basis for your contention that McKinney does not have a full compliment of adequate and up-to-date city services.

RESPONSE:

INTERROGATORY NO. 18:

Please describe how your property is currently used (ex. single family residence, farm, business). Be sure to provide an answer for each person protesting the CCN.

RESPONSE:

INTERROGATORY NO. 19:

If your property is used as a business, please describe the type business in operation on the property, or if your property is a single-family residence, please describe the number of people that reside on the property. Be sure to provide an answer for each person protesting the CCN.

RESPONSE:

INTERROGATORY NO. 20:

Please list the title and date of all documents that you used in the preparation of your answers to each interrogatory.

RESPONSE:

D. REQUESTS FOR ADMISSIONS

Admissions for Cynthia Kaminsky:

ADMISSION NO. 1

You do not want your property in McKinney's proposed CCN.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 2

You have not had your septic system inspected by a licensed profession in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 3

You have not had your septic system cleaned in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 4

You do not own or lease any property in the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 5

You do not own or lease any property in the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 6

You do not own or lease any property in the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 7

You do not own or lease any property in the area marked as "Area D" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 8

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 9

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 10

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 11

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area D" on the attached map labeled Exhibit 1.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 12

Your property is within two miles of the East Fork of the Trinity River.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 13

Your property is within two-miles of Wilson Creek.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 14

You own the property identified as "6. Kaminsky Robert M Etux" on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 15

You lease the property identified as "6. Kaminsky Robert M Etux" on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

Admissions for John Powell:

ADMISSION NO. 1

You do not want your property in McKinney's proposed CCN.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 2

You have not had your septic system inspected by a licensed profession in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 3

You have not had your septic system cleaned in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 4

You do not own or lease any property in the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 5

You do not own or lease any property in the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 6

You do not own or lease any property in the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 7

You do not own or lease any property in the area marked as "Area D" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 8

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 9

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 10

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 11

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area D" on the attached map labeled Exhibit 1.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 12

Your property is within two miles of the East Fork of the Trinity River.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 13

Your property is within two-miles of Wilson Creek.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 14

You own the property identified as "1. Powell John Jr. and Nicole" on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 15

You own the property identified as "2. Powell John Warren Jr." on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 16

You own the property identified as "3. Powell John W. Sr. &" on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 17

You own the property identified as "4. Powell John W. Sr." on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

Admissions for Karen and Robert Finch:

ADMISSION NO. 1

You do not want your property in McKinney's proposed CCN.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 2

You have not had your septic system inspected by a licensed profession in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 3

You have not had your septic system cleaned in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 4

You do not own or lease any property in the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 5

You do not own or lease any property in the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 6

You do not own or lease any property in the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 7

You do not own or lease any property in the area marked as "Area D" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 8

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 9

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 10

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 11

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area D" on the attached map labeled Exhibit 1.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 12

Your property is within two miles of the East Fork of the Trinity River.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 13

Your property is within two-miles of Wilson Creek.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 14

You own the property identified as "7. Finch Robert Lee Jr." on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

Admissions for Fred Hebert:

ADMISSION NO. 1

You do not want your property in McKinney's proposed CCN.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 2

You have not had your septic system inspected by a licensed profession in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 3

You have not had your septic system cleaned in the past three years.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 4

You do not own or lease any property in the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 5

You do not own or lease any property in the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 6

You do not own or lease any property in the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 7

You do not own or lease any property in the area marked as "Area D" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 8

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area A" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 9

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area B" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 10

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area C" on the attached map.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 11

You are not protesting the granting of McKinney's sewer CCN over the area marked as "Area D" on the attached map labeled Exhibit 1.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 12

Your property is within two miles of the East Fork of the Trinity River.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 13

Your property is within two-miles of Wilson Creek.

ADMIT, DENY, OR DETAILED EXPLANATION:

ADMISSION NO. 14

You own the property identified as "5. Hebert Fred J & Kathy R" on the attached map labeled Exhibit No. 2.

ADMIT, DENY, OR DETAILED EXPLANATION:

E. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO.1:

To the extent not already produced, please produce all the documents that you relied upon or used in the preparation of your answers to Interrogatories 1 - 20.

RESPONSE:

CERTIFICATE OF SERVICE

I hereby certify, by my signature below, that a true and correct copy of *City of McKinney's Requests for Interrogatories, Admissions, and Production to Cynthia Kaminsky, John Powell, Karen & Robert Finch, and Fred Hebert* was forwarded via First Class Mail, hand delivery or facsimile on February 20, 2007 to the following parties of record:

Arturo D. Rodriguez, Jr.
Russell & Rodriguez, L.L.P.
102 West Morrow Street, Suite 103
Georgetown, Texas 78626
(512) 930-1317
(512) 930-7742 (Fax)

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*Billy Jo Donihoo, David Strawn,
Felicia A. Saigling Estate,
W.M. Saigling, Jr., and aligned with Tim
Bennett Engineering & Construction, Inc.*

Blas Coy, Jr., Attorney
Scott Humphrey
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Office of Public Interest Counsel

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Austin, Texas 78711-3087
(512) 239-0750
(512) 239-0606 (Fax)

Executive Director of the TCEQ

Robert Gammenthaler
9637 County Road 867
Princeton, Texas 75407
(972) 734-1645

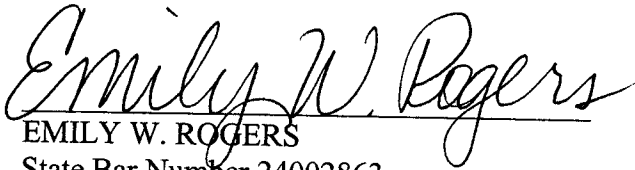
Aligned Group
Robert Gammenthaler
Marie Biggs
Louis G. and Linda G. Pollaehn

Cynthia Kaminsky
Engineer/Professor
2782 Briar Trail
McKinney, Texas 75069
(972) 898-3910
(972) 542-4077 (Fax)

Fred Herbert, Robert and Karen Finch,
John Powell, Sr., Cynthia Kaminsky

Martin Rochelle
David Klein
Lloyd Gosselink Blevins Rochelle Baldwin & Townsend
816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)

Attorneys for Boa Sorte, LLC


EMILY W. ROGERS
State Bar Number 24002863