



Control Number: 44541



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**SOAH DOCKET NO. 473-15-2102.WS**

**PUC DOCKET NO. 43463**

**FORNEY LAKE WATER SUPPLY §  
CORPORATION'S REQUEST FOR §  
CEASE AND DESIST ORDER AGAINST §  
THE CITY OF HEATH §**

2015 MAY -7 PM 1:19  
STATE OFFICE OF  
FILING CLERK  
ADMINISTRATIVE HEARINGS

**PUC DOCKET NO. 44541**

**APPLICATION OF CITY OF HEATH TO §  
AMEND A CERTIFICATE OF §  
CONVENIENCE AND NECESSITY AND §  
TO DECERTIFY A PORTION OF §  
FORNEY LAKE WATER SUPPLY §  
CORPORATION'S SERVICE AREA IN §  
ROCKWALL COUNTY §**

**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**NOTICE OF INTENTION TO TAKE THE  
ORAL DEPOSITION OF PATRICK HAIGH  
AND SUBPOENA DUCES TECUM BY AGREEMENT**

TO: Patrick Haigh by and through the attorney of record for Forney Lake Water Supply Corporation, Arturo Rodriguez, Russell and Rodriguez LLP, 1633 Williams Dr., Building 2, Suite 200, Georgetown, Texas 78632

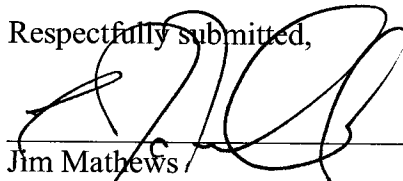
PLEASE TAKE NOTICE that pursuant to P.U.C. Procedural Rule 22.143 and by agreement of the parties, counsel for the City of Heath will take the oral deposition of Patrick Haigh on **Thursday, May 14, 2015, at 1:00 pm** at the City of Heath Offices, 200 Laurence Dr., Heath, Texas, and continuing from day to day thereafter until completed. The deposition will be taken under oath before an officer authorized by law to take the deposition. Such deposition may be used as evidence in the above styled causes.

PLEASE TAKE FURTHER NOTICE that, in connection with the taking of the deposition, the deponent shall produce the documents described on Attachment A to this notice.

The parties have agreed that service of this notice on Mr. Rodriguez has the same effect as a subpoena served on Mr. Haigh.

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Respectfully submitted,



Jim Mathews

State Bar No. 13188700

Mathews & Freeland, LLP

327 Congress Ave., Ste. 300

Austin, Texas 78701

Telephone (512) 404-7800

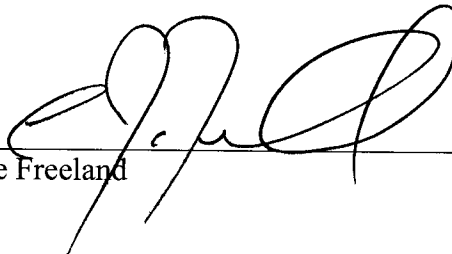
Facsimile (512) 703-2785

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Notice of Deposition was served on all parties of record in this proceeding on this 6th day of May, 2015, by hand-delivery, facsimile, electronic mail, and/or First Class Mail.

Arturo Rodriguez, Jr.  
Attorney for FLWSC  
Russell & Rodriguez LLP  
1633 Williams Dr., Building 2, Suite 200  
Georgetown, Texas 78632  
866-929-1641 (fax)

A.J. Smullen  
Attorney, Legal Division Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
512-936-7268 (fax)



Joe Freeland

## **ATTACHMENT A**

### **Documents Requested**

Patrick Haigh also is to bring all non-privileged documents (whether in print, magnetic, electronic or other format) such as, but not limited to, papers, studies, analyses, emails (both existing and deleted), notes, books, reports, computations, calculations, cost estimates, valuations, charts, spreadsheets, diagrams, maps, photographs, videotape, correspondence and writings and recordings of any kind that he has created, revised, reviewed, sent or received related to :

1. June 2, 2011 Notice to Forney Lake WSC.
2. Heath's Application for Single Certification filed on or about March 16, 2015.
3. Forney Lake WSC's Petition for Cease and Desist Order.
4. Any Property of Forney Lake that may be rendered useless or valueless if single certification as requested by Heath is granted.
5. Any Forney Lake WSC financial statement produced in the last ten years that pertains to its equipment and facilities located in Heath's corporate limits.