



Control Number: 44541



Item Number: 22

Addendum StartPage: 0

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
PUBLIC UTILITY COMMISSION
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

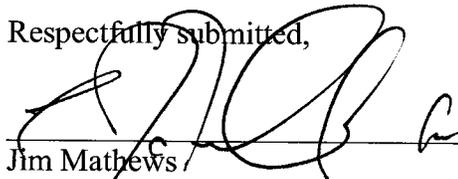
PLEASE TAKE NOTICE that pursuant to P.U.C. Procedural Rule 22.143 and by agreement of the parties, counsel for the City of Heath will take the oral deposition of Patrick Haigh on **Thursday, May 14, 2015, at 1:00 pm** at the City of Heath Offices, 200 Laurence Dr., Heath, Texas, and continuing from day 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

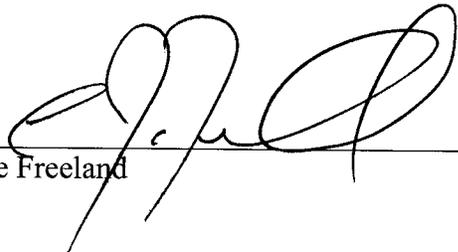
State Bar No. 13188700
Mathews & Freeland, LLP
327 Congress Ave., Ste. 300
Austin, Texas 78701
Telephone (512) 404-7800
Facsimile (512) 703-2785

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.