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Item Number: 102

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
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APPLICATION OF THE CITY OF	§	
CIBOLO FOR SINGLE	§	BEFORE THE STATE OFFICE
CERTIFICATION IN	§	
INCORPORATED AREA AND TO	§	
DECERTIFY PORTIONS OF GREEN	§	
VALLEY SPECIAL UTILITY	§	OF
DISTRICT'S SEWER CERTIFICATE	§	
OF CONVENIENCE AND	§	
NECESSITY IN GUADALUPE	§	ADMINISTRATIVE HEARINGS
COUNTY	§	
	§	

**CITY OF CIBOLO'S WITHDRAWAL OF MOTION TO COMPEL
GREEN VALLEY SPECIAL UTILITY DISTRICT TO FULLY RESPOND
TO THE CITY'S FOURTH REQUESTS FOR INFORMATION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

The City of Cibolo (the "City") hereby withdraws its Motion to Compel Green Valley Special Utility District ("GVSUD") to Fully Respond to the City's Fourth Requests for Information filed on December 2, 2016.

I. PROCEDURAL HISTORY

On November 8, 2016, the City propounded its Fourth Requests for Information ("RFI") on GVSUD. GVSUD did not file any objections to these RFIs and did not contact the attorney for the City regarding any objections or the meaning of any the specific RFIs. However, on November 28, 2016, GVSUD submitted its response, failing to provide appropriate responses to certain RFIs and claiming confusion pertaining to other RFIs. Accordingly, the City filed a Motion to Compel ("Motion") to request the Administrative Law Judge to direct GVSUD to fully respond to the City's discovery request in accordance with the Public Utility Commission's ("PUC") procedural rules and the Texas Rules of Civil Procedure. On December 6, 2016, SOAH

Order No. 6 – Describing Procedures Relating to Motions. Including Pending Motion to Compel was issued, directing the parties to begin negotiations no later than one working date after the date of the Order and to complete negotiations no later than five working dates after the date of the Order regarding this discovery dispute.

II. CERTIFICATE OF CONFERENCE AND WITHDRAWAL OF MOTION

On December 7, 2016, the parties conferred to schedule a conference call regarding the Motion and Order. On December 8, 2016, the parties participated in a conference call to wherein the parties negotiated diligently and in good faith regarding the discovery request subject to the Motion. The City was represented by David J. Klein and Ashleigh K. Acevedo, and GVSUD was represented by Geoffrey Kirshbaum and Shan Rutherford. Based on the conference call and GVSUD's December 8, 2016 First Supplemental Response to Cibolo's Fourth Request for Information ("Supplemental Response"), the parties have resolved all outstanding disputes relating to the City's Fourth RFI. As such, the City withdraws its Motion.

III. CONCLUSION

The City hereby withdraws its Motion to Compel GVSUD to Fully Respond to the City's Fourth Requests for Information and seeks no additional rulings from the Administrative Law Judges on this matter.

Respectfully submitted,

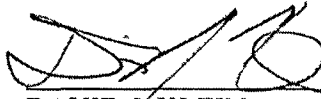
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ATTORNEYS FOR CITY OF CIBOLO

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by e-mail, fax, hand-delivery and/or regular, first class mail on this 9th day of December, 2016, to the parties of record.



David J. Klein