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APPLICATION OF THE CITY OF
CIBOLO FOR SINGLE
CERTIFICATION IN
INCORPORATED AREA AND TO
DECERTIFY PORTIONS OF GREEN
VALLEY SPECIAL UTILITY
DISTRICT'S SEWER CERTIFICATE
OF CONVENIENCE AND
NECESSITY IN GUADALUPE
COUNTY

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PUBLIC UTILITY COMMISSION
FILING CLERK
PUBLIC UTILITY COMMISSION

OF TEXAS

CITY OF CIBOLO'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR BRIEFS

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

The City of Cibolo (the "City") files this Motion for Leave to Exceed Page Limit for Briefs and in support hereof would show the following:

A full analysis of the applicable law and facts at issue in this proceeding, as well as responding to the nearly 200 page filing by Green Valley Special Utility District (the "District") compelled the City to exceed the 50-page limit imposed by 16 Tex. Admin. Code §22.72(f). Under that same rule, the presiding officer is allowed to permit parties to exceed this standard page limit. In establishing a larger page limit, the presiding officer shall consider factors including the burden of proof and the extent of opposition to a party's position that needs to be addressed in the brief.

Although the District has the burden of proof in its motion, the City must defend against the allegations asserted in the District's brief, which exceeded 190 pages.

WHEREFORE, PREMISES CONSIDERED, the City respectfully requests that it be granted leave to exceed the page limit as allowed under 16 Tex. Admin. Code § 22.72(f). The City also asks for any other relief to which it is justly entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)

DAVID J. KLEIN
State Bar No. 24041257
dklein@lglawfirm.com

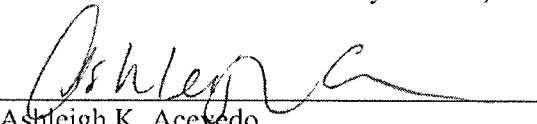
CHRISTIE DICKENSON
State Bar No. 24037667
cdickenson@lglawfirm.com


ASHLEIGH K. ACEVEDO
State Bar No. 24097273
aacevedo@lglawfirm.com

ATTORNEYS FOR THE 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 14th day of June, 2016 to the parties of record.


Ashleigh K. Acevedo