



Control Number: 45720



Item Number: 58

Addendum StartPage: 0

RECEIVED

PUC DOCKET NO. 45720  
SOAH DOCKET NO. 473-16-3831.WS

2016 AUG 11 PM 12:01

PUBLIC UTILITY COMMISSION  
FILING CLERK

APPLICATION OF RIO CONCHO § BEFORE THE STATE OFFICE  
AVIATION, INC. FOR A § OF  
RATE/TARIFF CHANGE § ADMINISTRATIVE HEARINGS

**RIO CONCHO AVIATION, INC.'S  
REQUEST FOR DISCLOSURE TO COMMISSION STAFF**

TO: PUC Commission Staff, by and through its attorney of record, Kennedy Meier, Staff Attorney, Public Utility Commission of Texas, 1701 N. Congress Avenue, Austin Texas 78701.

COMES NOW, Rio Concho Aviation, Inc. (hereinafter "Applicant"), in the above-styled and numbered cause, and serves this, its Request for Disclosure to Commission Staff.

Pursuant to Rule 194 of the Texas Rule of Civil Procedure, you are required to answer in complete detail and in writing each of the following requests for disclosure within 20 days of service of these requests.

Respectfully submitted,

THE CARLTON LAW FIRM, P.L.L.C.



---

JOHN J. CARLTON  
State Bar No. 03817600  
2705 Bee Cave Road, Suite 200  
Austin, Texas 78746  
Telephone (512) 614-0901  
Telecopier (512) 900-2855  
[john@carltonlawustin.com](mailto:john@carltonlawustin.com)

ATTORNEY FOR RIO CONCHO  
AVIATION, INC.

58

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 11<sup>th</sup> day of August, 2016.



---

JOHN J. CARLTON

## REQUESTS FOR DISCLOSURE

**REQUEST FOR DISCLOSURE NO. 194.2(a):** The correct names of the parties to this action.

**ANSWER:**

**REQUEST FOR DISCLOSURE NO. 194.2(c):** The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).

**ANSWER:**

**REQUEST FOR DISCLOSURE NO. 194.2(e):** The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

**ANSWER:**

**REQUEST FOR DISCLOSURE NO. 194.2(f):** For any testifying expert:

- (i) the expert's name, address and telephone number;
- (ii) the subject matter on which the expert will testify;
- (iii) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
- (iv) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
  - (a) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
  - (b) the expert's current resume and bibliography.

**ANSWER:**

**REQUEST FOR DISCLOSURE NO. 194.2(i):** Any witness statements described in Rule 192.3(h).

**ANSWER:**